



Regulatory Circular RG05-25

DATE: February 23, 2005

TO: Members and Member Firms

FROM: Market Operations Department

RE: Restrictions on Transactions in
Winn-Dixie (WIN)

The New York Stock Exchange suspended trading of Winn-Dixie Stores Inc. (WIN) following the grocer's bankruptcy filing Monday night. In a press release Tuesday, the stock exchange said it had been notified that Winn-Dixie plans to trade on the OTC Bulletin Board. The NYSE said it has applied to the Securities and Exchange Commission to delist the company's shares.

Winn-Dixie released a statement Tuesday morning, just after midnight, saying it had filed for Chapter 11 bankruptcy protection in the U.S. Bankruptcy Court for the Southern District of New York.

As of February 23, 2005 trading on CBOE in existing series of WIN options will be subject to the following restrictions. Only closing transactions may be effected in any series of WIN options except for (i) opening transactions by market-makers executed to accommodate closing transactions of other market participants and (ii) opening transactions by CBOE member organizations to facilitate the closing transactions of public customers executed as crosses pursuant to and in accordance with CBOE Rule 6.74(b) or (d).

The execution of opening transactions in WIN options, except as permitted above, and/or the misrepresentation as to whether an order is opening or closing, will constitute a violation of CBOE rules, and may result in disciplinary action. Member organizations should ensure that they have appropriate procedures in place to prevent their customers from entering opening orders in this restricted option class.

There are no restrictions in place with respect to the exercise of WIN options. The provisions of this circular apply to any options on Winn-Dixie traded on CBOE.

Any questions regarding this circular may directed to Kerry Winters at (312) 786-7312 or Joanne Heenan-Hustad at (312) 786-7786.