

IN THE UNITED STATES PATENT TRIAL & APPEAL BOARD

CQG, INC. and CQGT, LLC

Petitioners,

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.

Patent Owner.

U.S. Patent No. 6,772,132 B1

**PETITION FOR COVERED BUSINESS METHOD PATENT REVIEW
UNDER 35 U.S.C. § 321 AND § 18 OF THE LEAHY-SMITH AMERICA
INVENTS ACT**

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II. Introduction

Petitioners, CQG, Inc. and CQGT, LLC (collectively, “CQG”) request Post-Grant Review of claims 1–56 of Covered Business Method Patent, U.S. Patent No. 6,772,132 (“the ’132 patent”) (Ex. 1001). The ’132 patent issued on August 3, 2004 and is owned by Trading Technologies International, Inc. (“TT”). (*Id.*) The Petitioner will show below that the claims of the ’132 patent are unpatentable because they are directed to an abstract idea, and based on the broadest reasonable interpretation, lack written description. Accordingly, covered business method patent (“CBM”) review of claims 1–56 of the ’132 patent should be granted.

III. Mandatory Notices (37 C.F.R. § 42.8(b))

A. Real Party-in-Interest

The real parties-in-interest are CQG, Inc. and CQGT, LLC.

B. Related Matters

The ’132 patent is or has been involved in the following proceedings that may affect, or be affected by, a decision in this proceeding: *GL Trade Am., Inc. v. Trading Tech. Int'l, Inc.* (“TT”), 1:11-cv-001558 (N.D. Ill.); *TT v. TradeHelm, Inc.*, 1:10-cv-00931 (N.D. Ill.); *TT v. Rosenthal Collins Group, LLC*, 1:10-cv-00929 (N.D. Ill.); *TT v. Open E Cry, LLC, et al.*, 1:10-cv-00885 (N.D. Ill.); *TT v. thinkorswim Group, Inc., et al.*, 1:10-cv-00883 (N.D. Ill.); *TT v. Tradestation Sec.*,

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