IN THE UNITED STATES PATENT TRIAL & APPEAL BOARD

TRADESTATION GROUP, INC. AND
TRADESTATION SECURITIES, INC.

Petitioners,

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.

Patent Owner

U.S. Patent No. 7,783,556

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

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TABLE OF CONTENTS

I. INTRODUCTION 1

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(b) 2
A. Real-Parties-In-Interest 2
B. Related Matters 2
C. Lead and Back-Up Counsel 3

III. PAYMENT OF FEES 3

IV. SUMMARY OF THE '556 PATENT 4
A. Subject Matter Background 4
B. The '556 Patent Specification 5
C. The '556 patent Claims 10

V. GROUNDS FOR STANDING 14
A. The '556 Patent Is Directed to a Covered Business Method 15
B. The '556 Patent Is Not Directed to a Technological Invention 19

VI. CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.304(b)(3) 23
A. Broadest Reasonable Interpretation 23
1. "Computer readable Medium" 24

VII. CHALLENGE AND RELIEF REQUESTED 24

VIII. IT IS MORE LIKELY THAN NOT THAT AT LEAST ONE CLAIM OF THE '556 PATENT IS UNPATENTABLE 25
A. GROUND 1: Claims 1-22 Are Patent-Ineligible Under 35 USC § 101 25
1. The '556 patent claims are directed to an abstract idea 27
2. The '556 patent claim elements – either separately or as an ordered combination – do not include "significantly more" than the abstract concept 30
3. The '556 patent claims are neither tied to a "particular machine" nor do they "transform a particular article into a different state or thing" 32
4. The dependent claims also are patent ineligible 34
5. Finding the '556 patent claims patent ineligible is consistent with post-*Alice* Federal Circuit case law 36
(a) Versata Dev. Group, Inc. v. SAP Am., Inc., slip op. (Fed. Cir. July 9, 2015) 36
(b) OIP Technologies, Inc. v. Amazon.com, Inc., slip op. (Fed. Cir. June 11, 2015) 38

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(c) *Internet Patents Corp. v. Active Network, Inc.,* slip op. (Fed. Cir. June 23, 2015) 40

(d) *Ultramercial, LLC v. Hulu, LLC,* 772 F.3d 709 (Fed. Cir. 2014) 41

(e) *DDR Holdings, LLC v. Hotels.com L.P.,* 773 F.3d 1245 (Fed. Cir. 2014) 43

B. GROUND 2: Claims 12-22 Are Outside the Four Permissible Statutory Classes of Patentable Subject Matter 46

C. CONCLUSION.....48

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EXHIBITS

TS-1001	U.S. Patent No. 7,783,556 to Scott F. Singer, et al. ("'556 patent")
TS-1002	Prosecution History of the '556 patent
TS-1003	Lodewijk Petram, "The World's First Stock Exchange."
TS-1004	Ellen Terrell, "History of the American and NASDAQ Stock Exchanges", September, 2006 (Updated October, 2012)
TS-1005	U.S. Patent 6,317,728 (Kane)
TS-1006	Case No. 10-cv-0715 (N.D. Ill.) (Complaint for Patent Infringement).
TS-1007	*CRS Advanced Technologies, Inc. v. Frontline Technologies, Inc.,* CBM2012-00005, Paper No. 17 (Jan. 23, 2013)
TS-1008	157 Cong. Rec. S5402 (daily ed. Sept. 8, 2011)
TS-1009	SAP v. Versata, CBM2012-00001, Paper No. 36 (Jan. 9, 2013)
TS-1010	The American Heritage Dictionary of the English Language, 4th Ed.
TS-1011	The American Heritage Dictionary of the English Language, 3d Ed.
TS-1012	MPEP 2106
TS-1013	Patent Trial Practice Guide
TS-1014	*Volusion, Inc. v. Versata Software, Inc.,* CBM2013-00018, Institution Decision, Paper No. 8

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I. INTRODUCTION

TradeStation Group, Inc. and TradeStation Securities, Inc. (collectively, "Petitioners" or "TradeStation") petition for Covered Business Method ("CBM") Review of claims 1-22 ("the CBM Claims") of U.S. Patent No. 7,783,556 ("'556 patent"; TS-1001), which is owned by Trading Technologies International, Inc. ("Patent Owner" or "TT"). As explained in this petition, it is more likely than not that at least one claim of the '556 patent is invalid under 35 U.S.C. § 101 as being directed to patent ineligible subject matter.

Generally speaking, the '556 patent relates to a business method for displaying market information to a financial trader using a computing device. The '556 patent admits that the basic idea of using a computer having a graphical user interface ("GUI") to display and update market information, and otherwise enable a trader to interact with an electronic financial exchange, was well known. (TS-1001, '556 patent at Figs. 1-2 and 1:52-2:17) The purported invention of the '556 patent was simply to add another item of well-known financial information – namely, the profit or loss a trader would incur upon making a particular trade – to an electronic trading GUI that the patent admits is prior art. (*Id.*) Providing financial information to facilitate market trades – the basic idea of the '556 patent claims – is "a fundamental economic practice long prevalent in our system of commerce." *Alice Corp. Pty. Ltd. v. CLS Bank Int'l,* 134 S. Ct. 2347, 2356 (2014). Adding profit/loss

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