UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IBG LLC; INTERACTIVE BROKERS LLC; TRADESTATION GROUP INC.; TRADESTATION SECURITIES, INC.; TRADESTATION TECHNOLOGIES, INC.; and IBFX, INC.;

Petitioners

V.

TRADING TECHNOLOGIES INTERNATIONAL, INC., Patent Owner

Case CBM2015-00179 Patent 7,533,056

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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I.	The '056 patent claims a patent-ineligible abstract idea.					
	A.	Graphically displaying bids and offers to assist traders in placing orders is abstract.				
	B.	The claims of the '056 do not transform the abstract concept into an inventive concept.				
II.	Claim construction.					
	A.	"price axis"				
	B.	"order icon"12				
	C.	No o	ther terms need to be construed.	12		
III.	The '056 claims are obvious over the TSE combination.					
	A.	A. TSE is a prior art printed publication.				
		1.	Unrebutted evidence establishes that TSE was actually disseminated to the interested public in August 1998	13		
		2.	TSE was otherwise publicly available based on its wide, unrestricted distribution to the interested public.	16		
	B.	TT's attempt to swear behind TSE fails because TT fails to establish conception, diligence, and actual reduction to practice17				
		1.	TT's "Trading Game Design" fails to establish a conception because it doesn't teach "displayingindicators representing quantity."	3		
		2.	TT fails to establish that the invention was diligently reduced to practice because it fails to account for multiple, significant gaps during the critical period	18		
		3.	TT fails to establish actual reduction to practice	20		
	\mathbf{C}	The '	TSE combination renders claims 1-15 obvious	23		



		1.	TT creates a conventional wisdom straw-man just to knock it down in an attempt to avoid the undisputed teachings of TSE	23	
		2.	TSE teaches or suggests the claimed "order icon" of claims 5-7.	24	
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