

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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

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Case CBM2015-00181  
Patent 7,676,411

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**PETITIONERS' MOTION TO SEAL**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**I. RELIEF REQUESTED**

Petitioners respectfully request that the Board maintain as confidential and under seal the entirety of Exhibit 1052 – the deposition transcript of Christopher H. Thomas which was marked confidential by TT.

**II. GOOD CAUSE EXISTS FOR SEALING THIS CONFIDENTIAL INFORMATION.**

The Board may issue this order “for good cause.” 37 C.F.R. § 42.54. For good cause, the Board needs to know why information sought to be sealed constitutes confidential information. *Garmin Int’l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 36, Decision on Revised Mot. to Seal, p. 4 (P.T.A.B. Apr. 5, 2013). The Board then balances the needs in protecting the information against the public’s interest in maintaining a complete and understandable file history. *Id.* at 8.

During the deposition of Mr. Thomas, the parties stipulated to designate the entirety of the deposition transcript of Mr. Thomas as Confidential and pursuant to the Protective Order. In light of the agreement of the parties, Petitioner respectfully requests that Exhibit 1052 remain under seal until this Board has ruled otherwise.

To the best of Petitioner’s knowledge, the documents sought to be protected have not been made publically available.

It is therefore respectfully requested that the Board issue an Order regarding the confidentiality of Exhibit 1052.

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Date: September 9, 2016

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**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that the foregoing **MOTION TO SEAL**  
was served electronically via e-mail on September 9, 2016, in its entirety on  
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