UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TD AMERITRADE HOLDING CORPORATION, TD AMERITRADE, INC., and TD AMERITRADE ONLINE HOLDINGS CORP., Petitioners

V.

TRADING TECHNOLOGIES INTERNATIONAL, INC., Patent Owner

Case CBM2014-00131

Patent 7,533,056

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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II.	TT's claims are ineligible for patenting				
	A.	The claims are directed to the abstract idea of graphing bids and offers to help a trader make an order (Step 1)			
	B.	The claims do not recite an inventive concept (Step 2)			
	C.	The claims preempt the abstract idea of graphing bids and offers to assist a trader in making an order			
	D.	The cases cited by TT do not stand for the proposition that overcoming computer problems confers patent eligibility			
III.	TT's	TT's claims are obvious1			
	A.		The TSE combination teaches receiving a user's default quantity and sending the user's orders for that quantity		
		1.	The Board should construe default quantity to encompass ordinary meaning, which is taught by Togher		
		2.	The claims are obvious even under TT's unreasonably narr construction because it would have been obvious to modify combination to use the last-entered quantity	y the	
	B.	The TSE combination teaches displaying an order icon indicating user's order as recited in claim 5		_	
	C.	TT'	TT's remaining arguments are not on the merits		
		1.	The evidence of record shows that TSE is a prior-art public		
		2.	TD Ameritrade properly filed affidavits of accuracy supporthe TSE translation	_	
		3.	The TSE translation is accurate and understandable	23	



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IV.	The Board has jurisdiction over this proceeding			
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