

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IBG LLC, and INTERACTIVE BROKERS LLC,
Petitioners

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.
Patent Owner

Case CBM2016-00009
Patent No. 7,685,055 B2

**PETITIONERS' OBJECTIONS TO PATENT OWNER'S
EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

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

IBG LLC and Interactive Brokers LLC ("Petitioners") object under 37

C.F.R. § 42.64 to the admissibility of the following evidence Trading Technologies International, Inc. ("TT") served on Thursday, August 11, 2016:

TT Exhibit No.	Description
2337	Declaration of Jennifer M. Kurcz, dated Aug. 11, 2016
2389	Appendix 1 to Kurcz Declaration: <i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, eSpeed subpoena on Tokyo Stock Exchange (11/3/2004)
2390	Appendix 2 to Kurcz Declaration: <i>Trading Techs. Int'l. Inc., v. IBG LLC, et al.</i> , Case No. 10-cv-721, Trading Technologies International, Inc.'s First Set of Requests for the Production of Documents and Things to IBG LLC and Interactive Brokers LLC (Nos. 1 - 154) (09/22/2015)
2391	Appendix 3 to Kurcz Declaration: <i>Trading Techs. Int'l. Inc., v. TradeStation Securities, Inc., et al.</i> , Case No. 10-cv-884, Plaintiff Trading Technologies International, Inc.'s First Set of Requests for the Production of Documents and Things (Nos. 1 - 82) to TradeStation Securities, Inc. and TradeStation Group, Inc. (08/23/2010)
2392	Appendix 4 to Kurcz Declaration: <i>Trading Techs. Int'l. Inc., v. TradeStation Securities, Inc., et al.</i> , Case No. 10-cv-884, Plaintiff Trading Technologies International, Inc.'s Second Set of Requests for the Production of Documents and Things (Nos. 83 - 97) to TradeStation Securities, Inc. and TradeStation Group, Inc. (10/21/2015)

Petitioners ask the Patent Trial and Appeal Board to deny the admission and consideration of the following documents on the following bases:

FRE ARTICLE IV – RELEVANCE AND ITS LIMITS

Petitioners object to Exhibit No. 2337, 2389, 2390, 2391, and 2392 as irrelevant under FRE 401 and thus inadmissible under FRE 402, or as confusing or a waste of time under FRE 403, because these exhibits are not relevant to any issue remaining in this proceeding, such as patentability of the subject matter, broadest reasonable interpretation of the claims, anticipation of the claims in view of the prior art, or obviousness of the claims in view of the prior art.

* * *

These objections are made within five business days from the August 11, 2016 service of TT's exhibits.

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

/ Robert E. Sokohl/

Date: 8/18/2016

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Attorneys for Petitioners

CERTIFICATION OF SERVICE

The undersigned hereby certifies that on August 18, 2016, the attached
**Petitioners' Objections to Patent Owner's Evidence Pursuant to 37 C.F.R.
§ 42.64(b)(1)** were served electronically via e-mail upon the following counsel for
Patent Owner, TT:

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