Page 1

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

IBG LLC and INTERACTIVE   )
BROKERS LLC,   )
)
         Petitioner,   )
) Case CBM2016-00009
   vs.   ) U.S. Patent No.
) 7,685,055
TRADING TECHNOLOGIES   )
INTERNATIONAL, INC.,   )
)
         Patent Owner.   )
_____   )

Deposition of CHRISTOPHER H. THOMAS, taken
in the above-captioned cause, at McDonnell,
Boehnen, Hulbert & Berghoff, 300 South
Wacker Drive, Chicago, Illinois, before
Rachel F. Gard, CSR, RPR, CLR, CRR,
commencing at the hour of 9:05 a.m. on
Wednesday, October 26, 2016.

_____

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1   I N D E X

2   WITNESS   PAGE

3   CHRISTOPHER H. THOMAS

4   Cross-Examination by Mr. Bemben   4

5   Redirect Examination by Mr. Gannon   174

6   Recross-Examination by Mr. Bemben   179

7

8   E X H I B I T S

9   TRADING TECH EXHIBITS   PAGE

10   Exhibit 2169   Declaration of   5

11   Christopher H. Thomas

12   Exhibit 2201   Curriculum Vitae of   25

13   Christopher H. Thomas

14

15   IBG EXHIBITS   PAGE

16   Exhibit 1001   U.S. Patent No.   101

17   7,685,055

18   Exhibit 1008   Tokyo Stock Exchange   134

19   Operation System

20   Division

21

22   (ALL EXHIBITS RETAINED AND NOT ATTACHED)

1   (Witness sworn.)

2

3   WHEREUPON:

4   CHRISTOPHER H. THOMAS,

5   called as a witness herein, having been first duly

6   sworn, was examined and testified as follows:

7   CROSS-EXAMINATION

8   BY MR. BEMBEN:

9   Q.   Please state your name for the record.

10   A.   Christopher Hugh Thomas.

11   Q.   Mr. Thomas, I know you've been deposed. I

12   sat across from you several times this summer. I'll

13   still go over the ground rules. So I'll ask the

14   questions today, and you will answer. Please

15   provide verbal responses, so we can develop a clear

16   record. Okay?

17   A.   Yes.

18   Q.   And for the same reason, let's try not to

19   speak over each other. I'll allow you to answer my

20   questions. Just let me ask my questions.

21   A.   Sure.

22   Q.   If you don't understand a question, I'll

1   be happy to clarify it. Is that okay?

2   A.   Yes.

3   Q.   If you answer my question, I'll assume

4   that you've understood it. Is that fair?

5   A.   Yes.

6   Q.   During the deposition, I encourage you to

7   take breaks as needed. We'll try to take periodic

8   breaks maybe every hour or so. But if you need to

9   have a break, bathroom, get a drink or something

10   like that, just let me know. All I ask is that you

11   answer the pending question. Is that fair?

12   A.   Sure.

13   Q.   And you understand you're under oath

14   today?

15   A.   Yes.

16   Q.   Is there any reason at all you cannot give

17   truthful and complete testimony today?

18   A.   No.

19   Q.   Okay. Okay. Mr. Thomas, I'm going to

20   hand you what has been marked in this proceeding as

21   Trading Tech Exhibit 2169 and this proceeding is

22   CBM2016-00009.

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