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 7,685,055

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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II. Claim construction 10

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B. "price level" 11

C. other terms 12

III. TSE is a prior art printed publication. 12

A. Unrebutted evidence establishes that TSE was actually disseminated to the interested public in August 1998. 12

B. TSE was otherwise publicly available based on its wide, unrestricted distribution to the interested public. 14

IV. The '055 claims are obvious over the TSE combinations. 15

A. TSE renders obvious claims 1 and 17. 16

1. TSE's compressed mode is "static." 17

a) TSE's compressed, non-scrolling mode is static. 17

b) TSE's compressed, scrolling mode is also static. 19

2. TSE teaches "adjusting the first plurality [of] price levels" and changing "a number of the plurality of locations" in the bid/ask display regions. 20

a) Blank screen locations aren't "price levels." 20

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b) The "locations" in the bid/ask display regions correspond to price levels. 22

3. TSE teaches the disputed limitations even under TT's flawed theories—transitioning TSE's display from non-compressed, boardx4 to non-compressed, boardx2. 23

4. TT's "end-based repositioning" and "teaching away" arguments aren't commensurate with the scope of the claims. 25

5. TSE teaches re-positioning the inside market at a new desired location. 26

B. The TSE combinations render obvious the dependent claims. 27

V. Abilock's technical analysis of TSE is irrelevant; he is, at most, an expert in Japanese-English translation. 29

VI. The '055 patent is CBM eligible. 29

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