

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' REQUEST FOR ORAL ARGUMENT

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

Pursuant to 37 C.F.R. § 42.70 and the Board's April 28, 2016 Scheduling Order (Paper 21) Petitioners respectfully request oral argument, which is currently scheduled for January 6, 2017, on the issues raised in the Petition for *Inter Partes* Review of U.S. Patent 7,685,055 ("the '055 patent"), Patent Owner's Preliminary Response, Patent Owner's Response, and Petitioners' Reply to Patent Owner's Response. The issues to be argued are:

- The construction of certain terms of the '055 patent;
- The instituted grounds of unpatentability, namely whether:
 - claims 1-19 are unpatentable under 35 U.S.C. § 101 as being patent ineligible;
 - claims 1, 3, 4, 6-15, and 17-19 are unpatentable over TSE;
 - claims 2 and 5 are unpatentable over TSE and Gutterman;
 - claim 16 is unpatentable over TSE and Belden;
- Any issues identified in Patent Owner's Request for Oral Argument;
- Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed, such as Motions to Exclude; and
- Any other issues the Board deems necessary for issuing a final written decision.

Petitioners request the ability to use audio visual equipment to display possible demonstratives and exhibits, including the use of a computer, projector and screen.

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

/Robert Sokohl/

Robert E. Sokohl, Reg. No. 36,013
Attorney for Petitioners

Date: December 13, 2016
1100 New York Avenue, N.W.
Washington, D.C. 20005
(202) 371-2600

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **PETITIONERS' REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail on December 13, 2016 in its entirety on the following:

Erika H. Arner, Reg. No. 57,540 erika.arner@finnegan.com
Joshua L. Goldberg, Reg. No. 59,369 joshua.goldberg@finnegan.com
Kevin D. Rodkey, Reg. No. 65,506 kevin.rodkey@finnegan.com
Rachel L. Emsley, Reg. No. 63,558 rachel.emsley@finnegan.com
Cory C. Bell, Reg. No. 75,056 cory.bell@finnegan.com
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
Trading-Tech-CBM@finnegan.com

Stephen F. Borsand, Reg. No. 36,752 tt-patent-cbm@tradingtechnologies.com
Jay Q. Knobloch, Reg. No. 57,347 jay.knobloch@tradingtechnologies.com
TRADING TECHNOLOGIES INTERNATIONAL, INC.

Michael D. Gannon, Reg. No. 36,087 gannon@mbhb.com
Leif R. Sigmond, Jr., Reg. No. 35,680 sigmond@mbhb.com
Jennifer M. Kurcz, Reg. No. 54,481 kurcz@mbhb.com
Cole B. Richter, Reg. No. 65,398 richter@mbhb.com
MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP

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

/Robert Sokohl/

Robert E. Sokohl, Reg. No. 36,013
Attorney for Petitioners

Date: December 13, 2016

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

4920288_1.docx