

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**TRADESTATION GROUP, INC.,
TRADESTATION SECURITIES, INC., IBG LLC, AND
INTERACTIVE BROKERS LLC**

Petitioners,

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.

Patent Owner

U.S. Patent No. 7,904,374

**PETITION FOR COVERED BUSINESS METHOD REVIEW UNDER 35
U.S.C. § 321 AND § 18 OF THE LEAHY-SMITH AMERICA INVENTS ACT**

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Table of Contents

I.	INTRODUCTION	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(b)	2
A.	Real-Parties-In-Interest.....	2
B.	Related Matters	2
C.	Lead and Back-Up Counsel.....	2
III.	PAYMENT OF FEES	3
IV.	SUMMARY OF THE '374 PATENT	3
A.	Subject Matter Background	3
B.	The '374 Patent Specification.....	5
C.	The '374 Patent Claims	9
V.	FOUNDATIONS FOR STANDING.....	15
A.	The '374 Patent Is Directed to a Covered Business Method.....	15
B.	The '374 Patent Is Not Directed to a Technological Invention.....	18
1.	Claims 1-36 of the '374 patent are not directed to a novel, unobvious technological feature.	19
2.	The '374 patent does not solve a “technological problem using a technical solution.”	22
VI.	CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.304(b)(3)	24
A.	Broadest Reasonable Interpretation (“BRI”).....	24
1.	“Mapping, by the computing device, the plurality of sequential price levels to the plurality of graphical locations”	25
2.	“Computer Readable Medium”	26
3.	“Single Action”	27
VII.	CHALLENGE AND RELIEF REQUESTED.....	27
VIII.	IT IS MORE LIKELY THAN NOT THAT AT LEAST ONE CLAIM OF THE '374 PATENT IS UNPATENTABLE.....	28
A.	GROUND 1: Claims 1-36 Are Patent-Ineligible Under 35 USC § 101	28
1.	The '374 patent claims are directed to an abstract idea	29
2.	The claims do not recite an inventive concept (<i>Alice</i> Step 2).....	33
3.	The claims are not rooted in computer technology.....	44
4.	<i>TT v. CQG</i> is not controlling precedent	47
B.	GROUND 2: Claim 36 is Outside the Four Permissible Statutory Classes of Patentable Subject Matter	48
C.	CONCLUSION.....	50

EXHIBITS

TS-1001	U.S. Patent No. 7,904,374 (“’374 patent”)
TS-1002	Prosecution History of the ’374 patent
TS-1003	Certified Translation of “Futures/Option Purchasing System Trading Terminal Operation Guide” (“TSE”)
TS-1004	U.S. Patent No. 5,297,031 (“Gutterman”)
TS-1005	WO 90/11571 to Belden, et al. (“Belden”)
TS-1006	Certificate of Translation for “Futures/Option Purchasing System Trader Terminal Operation Guide” (“TSE Certificate”)
TS-1007	List of materials relied upon in the declaration of Kendyl A. Román
TS-1008	Curriculum Vitae of Kendyl A. Román
TS-1009	Deposition Transcript of Atushi Kawashima, <i>Trading Techs. Int’l., Inc. v. eSPEED, Inc.</i> , Case No. 04-cv-5312, United States District Court, Northern District of Illinois, Eastern Division, dated November 21, 2005 (“Kawashima Depo. T.”)
TS-1010	“Futures/Option Purchasing System Trading Terminal Operation Guide,” Tokyo Stock Exchange” (“TSE JP”)
TS-1011	Declaration of Kendyl A. Román
TS-1012	Lodewijk Petram, The World’s First Stock Exchange
TS-1013	History of the American and NASDAQ Stock Exchanges
TS-1014	Complaint for Patent Infringement
TS-1015	Office Patent Trial Practice Guide

TS-1016	The American Heritage Dictionary of the English Language, 3d Ed. (1992)
TS-1017	MPEP 2106
TS-1018	Volusion, Inc. v. Versata Software, Inc., CBM2013-00018, Institution Decision, Paper No. 8
TS-1019	Letter to Dir. Michelle K. Lee
TS-1020	Weiss, "After the Trade is Made"
TS-1021	U.S. Patent No. 5,375,055 to Togher et al. ("Togher")
TS-1022-1032	Reserved
TS-1033	Trading Techs. Int'l. v. CQG No. 05-cv-4811, slip op. at 10 (N.D. Ill. Feb. 24, 2015)
TS-1034	U.S. Patent No. 5,960,411 to Harman Peri et al. ("the Amazon one-click patent")
TS-1035	Dictionary of Computing (4th Ed, Oxford University Press, 1996)
TS-1036	Inside Macintosh, Promotional Edition

I. INTRODUCTION

TradeStation Group, Inc., TradeStation Securities, Inc. (“TradeStation”), IBG LLC, and Interactive Brokers LLC (“IBG,” collectively, “Petitioners”) petition for Covered Business Method (“CBM”) Review of claims 1-36 (“the Challenged Claims”) of U.S. Patent No. 7,904,374 (“’374 patent”; TS-1001), which is owned by Trading Technologies International, Inc. (“Patent Owner” or “TT”). As explained in this petition, the Challenged Claims are more likely than not invalid under 35 U.S.C. § 101 as being directed to patent ineligible subject matter.

The ’374 patent claims recite the well understood, routine, and conventional activities of receiving market data, displaying the data on a computer, receiving a user’s order, and sending it to an exchange. The ’374 patent admits that the basic idea of using a computer having “interactive trading screens” to display and update market information, and otherwise enabling a user to interact with electronic financial exchanges, was well known. (TS-1001, ’374 patent, 1:61-2:5) The purported invention of the ’374 patent was simply to rearrange elements of these known interactive trading screens into a different format, while providing essentially the same functionality – namely, making market trades based on displayed market information and user input. But providing financial information to facilitate market trades – the basic idea of the ’374 patent claims – is “a fundamental economic practice long prevalent in our system of commerce.” *Alice Corp. Pty. Ltd. v. CLS*

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