

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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IBG LLC,  
INTERACTIVE BROKERS LLC,  
TRADESTATION GROUP INC., and  
TRADESTATION SECURITIES, INC.  
Petitioners

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.  
Patent Owner

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CBM2016-00054  
Patent No. 7,693,768

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

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

IBG LLC, Interactive Brokers LLC, TradeStation Group, Inc., and

TradeStation Securities, Inc. (collectively, "Petitioners") object under 37 C.F.R. §

42.64 to the admissibility of the following evidence Trading Technologies

International, Inc. ("TT" or "Patent Owner") filed and served on January 20, 2017.

Petitioners ask the Patent Trial and Appeal Board to deny the admission and

consideration of the following documents on the following bases:

TT Exhibit No.	Description
2034	<i>Trading Techs. Int'l, Inc. v. eSpeed, Inc.</i> , Case No. 1:04-CV-05312 (N.D. Ill.), Jury Verdict Form (Oct. 10, 2007)
2042	Decision Denying Request for Ex Parte Reexamination 90/011,250 (July 15, 2011)
2047	Corrected Request for Ex Parte Reexamination 90/008,576 (May 25, 2007)
2049	Request for Reexamination 90/011,250 (Sept. 22, 2010)
2056	Japanese Patent 2004-504652
2121	U.S. Patent Classification System – Classification Definitions – Class 705
2126	Senate Congressional Record, S5402-S5443 (Sept. 8, 2011)
2143	<b>CONFIDENTIAL</b> - TS0028765
2144	<b>CONFIDENTIAL</b> - TS0107054
2154	<b>CONFIDENTIAL</b> - Video Deposition Transcript of Milan Galik, dated June 13, 2016 in <i>Trading Technologies International, Inc. v. BGC Parnters, Inc.</i> , Case No. 1:10-cv-715 (Consolidated) (N.D. Ill.).
2159	TSE-filed opposition document to Japanese Patent Application No. 2001-564025 (TSE0000000982-995)
2160	Certified Translation of TSE-filed opposition document to Japanese Patent Application No. 2001-564025 (TSE0000000982-995)
2161	Certification of Translation of TSE-filed opposition document to Japanese Patent Application No. 2001-564025 (TSE0000000982-995)
2163	Deposition Transcript of Atushi Kawashima, dated June 17,

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	2016
2165	Deposition Transcript of Kendyl A. Roman, dated May 3, 2016
2166	Deposition Transcript of Kendyl A. Roman, dated May 5, 2016
2168	Declaration of Eric Gould-Bear, 1/18/2017
2169	<b>CONFIDENTIAL</b> - Declaration of Christopher Thomas, 1/19/2017
2170	Declaration of Michael Burns, 1/18/2017
2171	Declaration of Timothy Geannopulos, 1/18/2017
2172	<b>CONFIDENTIAL</b> - Declaration of Jay Knobloch, 1/17/2017
2173	Declaration of Robbie McDonnell, 1/19/2017
2174	Declaration of Dan Olsen, 1/18/2017
2175	Exhibit TSE1 from Kawashima 2005 Deposition (TSE0000000996-1016)
2176	Certified Translation of Exhibit TSE1 from Kawashima 2005 Deposition (TSE0000000996-1016)
2177	Certification of Translation of Exhibit TSE1 from Kawashima 2005 Deposition (TSE0000000996-1016)
2178	Declaration of Harold Abilock, 1/19/2017
2201	Christopher Thomas CV
2202	Reexam Certificate for U.S. Patent No. 6,772,132
2203	Reexam Certificate for U.S. Patent No. 6,766,304
2204	Microsoft DNA Case Study
2206	Excerpts from Interactive Brokers Group, Inc. Form 10-K Statement IBG_00000412-421
2207	Excerpts from TradeStation Group, Inc. Form 10-K Statement TS0005177-88
2208	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Expert Report of David Silverman
2209	Globex User Guide June 1995 (get excerpt -cover and p. 61)
2210	Declaration of Daniel Durkin TTX00020829-00020830 (05/28/2004)
2211	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Trial Transcript - Brumfield Trial Testimony
2212	Animation
2213	Brumfield Sketch - eSpeed_PTX0321
2214	Animation
2215	Brumfield Trading Results - eSpeed_PTX0396
2216	Declaration of David Martin TTX00061557-00061558 (08/13/2004)
2217	Brumfield Articles, CQG014380172-177 and CQG014380206-

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2218	Declaration of James Zellinger, TTX00061410-00061412 (08/31/2004)
2219	Declaration of Ray Cahnman, TTX00061529- 00061530 (07/23/2004)
2220	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Trial Transcript - David Feltes Trial Testimony
2221	Declaration of Charles McElveen, TTX00061559-00061560 (05/18/2004)
2222	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Trial Transcript - Tim Geannopoulos Trial Testimony
2223	Trader Declaration Compilation
2224	<b>CONFIDENTIAL</b> - <i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from David Martin Deposition (06/08/2006)
2225	<b>CONFIDENTIAL</b> - <i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from Charles McElveen Deposition (01/17/2006)
2226	Steidlmayer, J. Peter, <i>Steidlmayer on Markets Trading with Market Profile</i> , 2ed (2003) - PTX0814
2227	Declaration of Scott Johnston TTX00061397- 00061398 (09/24/2004)
2228	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from Scott Johnston Deposition (06/27/2006)
2229	Declaration of Tom Grisafi TTX00061542-00061543 (07/31/2004)
2230	Collins, Daniel, <i>What is Behind your Front-End?</i> , Smart Trading 2001 - PTX0620
2231	eSpeed_PTX0782
2232	<b>CONFIDENTIAL</b> - <i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from Elliot Lapan Deposition (06/04/2007)
2233	U.S. Patent No. 7,693,768 Claim Chart , with Exhibits 1-6
2234	Screenshot - Market Depth Trader Window
2235	Screenshot - Placing Non-Automated Futures Trades
2236	Screenshot - About the Matrix Window
2237	TTX03586066-70
2238	Screenshot - TradeStation® Securities MATRIX
2239	Declaration of Dieter Marlovics TTX00061553-00061554 (08/09/2004)

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2240	eSpeed_PTX0038
2241	eSpeed_PTX0078
2242	eSpeed_PTX0123
2243	eSpeed_PTX0279
2244	eSpeed_PTX0281
2245	eSpeed_PTX0286
2246	eSpeed_PTX0294
2247	<b>CONFIDENTIAL</b> - <i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from Raymond Deux Deposition (11/03/2006)
2248	eSpeed_PTX2064
2249	eSpeed_PTX2077
2250	eSpeed_PTX0438
2251	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Trial Transcript - Amanda Lewis Trial Testimony
2252	eSpeed_PDX0215
2253	eSpeed_PTX1366
2254	eSpeed_PTX0080
2255	eSpeed_PTX1367
2256	eSpeed_PTX0081
2257	eSpeed_PTX1356
2258	eSpeed_PTX0110
2259	eSpeed_PTX1360
2260	eSpeed_PTX0448
2261	eSpeed_PTX1357
2262	eSpeed_PTX0079
2263	eSpeed_PTX1358
2264	eSpeed_PTX1359
2265	eSpeed_PTX1361
2266	eSpeed_PTX1362
2267	eSpeed_PTX1363
2268	eSpeed_PTX1364
2269	eSpeed_PTX1365
2270	<b>CONFIDENTIAL</b> - eSpeed_PTX0036
2271	eSpeed_PTX0440
2272	eSpeed_PTX0441
2273	eSpeed_PTX1371
2274	eSpeed_PTX1369
2275	<i>Trading Techs. Int'l. Inc., v. eSpeed, Inc.</i> , Case No. 04-cv-5312, Excerpts from David Feltes (01/24/ 2007)

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