

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

IBG LLC, INTERACTIVE BROKERS LLC,
TRADESTATION GROUP, INC. and
TRADESTATION TECHNOLOGIES, INC.

Petitioners

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.

Patent Owner

CBM2016-00087 (Patent No. 7,412,416)

Deposition of CHRISTOPHER H. THOMAS, taken at
McDonnell Boehnen Hulbert & Berghoff LLP,
before Donna M. Kazaitis, IL-CSR, RPR, CLR,
and CRR, commencing at the hour of 1:03 p.m.
on Monday, May 8, 2017.

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IBG 1058
IBG v. TT
CBM2016-00087

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CHRISTOPHER H. THOMAS

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EXHIBITS

TRADING TECH

PAGE

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H. Thomas

(CBM2016-00087)

IBG

Exhibit 1001 U.S. Patent 7, 412,416 125

(CBM2016-00087)

THOMAS

Exhibit 1 VIII Claim Construction 119

1 (Witness sworn.)

2 CHRISTOPHER H. THOMAS,
3 having been first duly sworn, was examined and
4 testified as follows:

5 EXAMINATION

6 BY MR. SOKOHL:

7 Q. Good afternoon, Mr. Thomas. How are
8 you?

9 A. Good.

10 Q. You've gone through this a few times.
11 I know you know the ground rules. But are you on
12 any medications today that would not allow you to
13 give truthful testimony?

14 A. No.

15 Q. Any other reason why you wouldn't be
16 able to give truthful testimony?

17 A. No.

18 Q. If you don't understand the question,
19 just ask me to clarify it.

20 A. Okay.

21 Q. If you answer it, I'm going to assume
22 you understood it.

1 A. Correct.

2 Q. If you want to take a break, just ask.
3 I'd just ask that you finish the question that's
4 pending.

5 A. Yes.

6 Q. Let me just give you the documents.
7 I'm going to hand you what has been marked Exhibit
8 2169 in CBM2016-00087 which is the declaration of
9 Christopher H. Thomas for U.S. Patent Number
10 7,412,416. (Document tendered to the witness.)

11 Do you recognize this document?

12 A. Yes, I do.

13 When I was reviewing this document,
14 there's a section in here, Claim Construction,
15 that is wrong.

16 Q. Okay.

17 A. And I made a correction to it. So I'd
18 like to mark that, if I can.

19 Q. Sure. We'll get to that. We can do
20 it now.

21 A. Okay. Just let me briefly explain it.

22 Q. Sure, go ahead.

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