UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TRADING TECHNOLOGIES INTERNATIONAL, INC.
Patent Owner

Patent No. 7,412,416 B2

DECLARATION OF KENDYL A. ROMÁN
IN SUPPORT OF PETITION FOR
COVERED BUSINESS METHOD REVIEW OF U.S. PATENT 7,412,416

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I, Kendyl A. Román, declare as follows:

1. I have been engaged by Sterne, Kessler, Goldstein & Fox P.L.L.C. on behalf of Petitioners, IBG LLC, Interactive Brokers LLC, TradeStation Group, Inc., and TradeStation Securities, Inc., for the above-captioned Covered Business Method (CBM) review proceeding. I understand that this proceeding involves United States Patent 7,412,416, entitled "User interface for an electronic trading system," by Richard W. Friesen and Peter C. Hart, filed May 3, 2006, and issued August 12, 2008 (the "'416 Patent"). I understand that the '416 Patent claims priority to application No. 09/289,550 (now United States Patent 7,212,999), filed April 9, 1999. For the purposes of CBM review, I assume the earliest possible priority date of the '416 Patent is the April 9, 1999 filing date to which the '416 Patent claims priority. I understand that the '416 Patent is currently assigned to Trading Technologies International, Inc. ("TT").

2. I have reviewed and am familiar with the specification of the '416 Patent. I understand that the '416 Patent has been provided as Ex. 1001. I will cite to the specification using the following format ('416 Patent, 1:1-10). This example citation points to the '416 Patent specification at column 1, lines 1-10.

3. I have reviewed and am familiar with the file history of the '416 Patent. I understand that the file history has been provided as Ex. 1002.

4. I have also reviewed and am familiar with the following prior art used in the Petition for Covered Business Method Review of the '416 Patent:

- A certified translation of "Futures/Option Purchasing System Trading Terminal Operation Guide" ("TSE") and the original figures in the Japanese-language original. The translation is Exhibit 1016, and the original is Exhibit 1015.

- U.S. Patent No. 5,347,452 to Bay, Jr. ("Bay"), Exhibit 1042.

- U.S. Patent No. 5,646,992 to Subler *et al.* ("Subler"), Exhibit 1020.

A complete listing of additional materials considered and relied upon in preparation of my declaration is provided as Ex. 1014. I have relied on these materials to varying degrees. Citations to these materials that appear below are meant to be exemplary but not exhaustive.

5. The '416 Patent describes a graphical user interface for electronic trading systems. ('416 Patent, Title, 1:15-17.) I am familiar with the subject matter described in the '416 Patent as of the earliest possible priority date of the '416 Patent (April 9, 1999).

6. I have been asked to provide my technical review, analysis, insights and opinions regarding the '416 Patent and the above-noted references that form

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