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

CBM2016-00087 Patent 7,412,416 B2

PETITIONERS' OPPOSITION TO PATENT OWNER'S MOTION TO EXCLUDE

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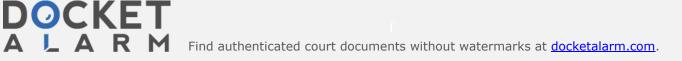


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II.	. TSE is relevant and has been properly authenticated				
A	۱.	TSE is relevant for at least resolving the factual issues undergirding the			
		§ 101 and CBM-eligibility analyses2			
В	.	TSE has been properly authenticated			
	1.	TSE has been authenticated under FRE 901(b)(1)4			
	2.	TSE is self-authenticated under FRE 902(11)4			
	3.	TSE is authenticated under FRE 901(b)(4)			
	4.	Patent Owner deposed Mr. Kawashima twice and still has no basis to dispute his testimony or the authenticity of Exhibit 10157			
III.	I. The 2005 Kawashima deposition transcript is not impermissible hearsay9				
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UPDATED EXHIBIT LIST

Ex. No.	Description
1001	U.S. Patent No. 7,412,416 B2 to Friesen et al. ("'416 patent")
1002	File History of Application Ser. No. 11/417,522, which became the
	'416 patent, as filed and obtained from PAIR ("'416 File History")
1003	U.S. Patent No. 7,533,056 to Friesen et al. ("'056 patent")
1004	INTENTIONALLY SKIPPED
1005	TD Ameritrade Holding Corp. v. Trading Techs. Int'l, Inc.,
	CBM2014-00131, Paper 19 ("'131 Ins. Dec.")
1006	TD Ameritrade Holding Corp. v. Trading Techs. Int'l, Inc.,
	CBM2014-00131, Paper 24 ("131 Reh'g Dec.")
1007	TD Ameritrade Holding Corp. v. Trading Techs. Int'l, Inc.,
	CBM2014-00131, Paper 38 ("'131 POR")
1008	IBG LLC v. Trading Techs. Int'l, Inc., CBM2015-00179, Paper 21
	("179 POPR")
1009	Trading Techs. Int'l. v. CQG, No. 05-cv-4811, Slip. Op. (N.D. Ill.
	Feb. 24, 2015) ("TT v. CQG Slip. Op.")
1010	Transcript of the Deposition of Christopher Thomas, April 28, 2015
	("Thomas Tr.")
1011	Redacted Second Corrected Expert Report of Christopher Thomas,
	Trading Technologies International, Inc. v. CQG, Inc., Case No.
	1:05-CV-04811 (N.D. Ill. Dec. 12, 2013) ("Thomas Report")
1012	Expert Declaration of Kendyl A. Román ("Román Decl.")
1013	Curriculum Vitae of Kendyl A. Román ("Román CV")
1014	List of Materials Considered by Kendyl A. Román ("Román List of
101 -	Materials")
1015	"Futures/Option Purchasing System Trading Terminal Operation
1016	Guidelines," Tokyo Stock Exchange ("TSE JP")
1016	Certified Translation of "System for Buying and Selling Futures and
1017	Options Transaction Terminal Operational Guidelines" ("TSE")
1017	Certificate of Translation for "System for Buying and Selling
	Futures and Options Transaction Terminal Operational Guidelines" ("TSE Certificate")
1018	Deposition Transcript of Atsushi Kawashima, Trading Technologies
1010	International, Inc., v. eSPEED, Inc., Case No. 04-cv-5312, United
	States District Court, Northern District of Illinois, Eastern Division,
	dated November 21, 2005 ("Kawashima Dep. Tr.")
1019	U.S. Patent No. 5,619,631 to Schott ("Schott")
1017	C.S. 1 ment 110. 3,017,031 to Denott (Denott)

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Ex. No.	Description
1020	U.S. Patent No. 5,646,992 to Subler et al. ("Subler")
1021	INTENTIONALLY SKIPPED
1022	U.S. Patent No. 5,136,501 to Silverman et al. ("Silverman")
1023	U.S. Patent No. 5,297,031 to Gutterman et al. ("Gutterman")
1024	WO 90/11571 to Belden
1025	Mark J. Powers, "Starting Out in Futures Trading," Sixth Edition,
	2001 ("Powers")
1026	History of the American and NASDAQ Stock Exchanges
1027	David M. Weiss, "After the Trade is Made," 1993 ("Weiss")
1028	INTENTIONALLY LEFT BLANK
1029	Alan Cooper, "About Face: The Essentials of User Interface
	Design," First Edition, 1995. ("Cooper")
1030	Ben Shneiderman, "Designing the User Interface: Strategies for
	Effective Human-Computer Interaction," Third Edition, 1998
	("Shneiderman")
1031	INTENTIONALLY SKIPPED
1032	INTENTIONALLY SKIPPED
1033	Richard W. Arms Jr., "Profits in Volume - Equivolume Charting,"
	1971 ("Arms")
1034	INTENTIONALLY SKIPPED
1035	Inside Macintosh, Promotional Edition, Apple Computer, Inc., 1985
	("Inside Macintosh")
1036	Valerie Illingworth, and I. C. Pyle, Dictionary of Computing, 4th
	Ed, Oxford University Press, 1996 ("Oxford Dictionary")
1037	U.S. Patent No. 1,760,287 to Schippers ("Schippers")
1038	INTENTIONALLY SKIPPED
1039	INTENTIONALLY SKIPPED
1040	Merriam-Webster's Collegiate Dictionary, Tenth Edition, 1998.
1041	TradeStation Gr'p, Inc. v. Trading Techs. Int'l, Inc., CBM2015-
10.10	00161, Paper 29 ("161 Ins. Dec.")
1042	U.S. Patent No. 5,347,452 to Bay, Jr. ("Bay")
1043	Transcript of the Deposition of Atushi Kawashima, IBG, LLC et al.
	v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -00182,
	June 17, 2016
1044	Declaration of Robert E. Sokohl.
1045	SERVED (NOT FILED)

Ex. No.	Description
1046	Exhibit No. 1 from the Deposition of Atushi Kawashima, IBG, LLC
	et al. v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -
1045	00182, June 17, 2016.
1047	Certified English Translation of Exhibit No. 1 from the Deposition
	of Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
1040	CBM2015-00179, -00181, and -00182, June 17, 2016.
1048	Certification of Translation of Exhibit No. 1 from the Deposition of Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
	CBM2015-00179, -00181, and -00182, June 17, 2016.
1049	Exhibit No. 2 from the Deposition of Atushi Kawashima, IBG, LLC
1042	et al. v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -
	00182, June 17, 2016
1050	Certified English Translation of Exhibit No. 2 from the Deposition
	of Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
	CBM2015-00179, -00181, and -00182, June 17, 2016.
1051	Certification of Translation of Exhibit No. 2 from the Deposition of
	Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
	CBM2015-00179, -00181, and -00182, June 17, 2016.
1052	Exhibit No. 3 from the Deposition of Atushi Kawashima, IBG, LLC
	et al. v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -
1050	00182, June 17, 2016.
1053	Certified English Translation of Exhibit No. 3 from the Deposition
	of Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -00182, June 17, 2016.
1054	Certification of Translation of Exhibit No. 3 from the Deposition of
1054	Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
	CBM2015-00179, -00181, and -00182, June 17, 2016.
1055	Exhibit No. 4 from the Deposition of Atushi Kawashima, IBG, LLC
	et al. v. Trading Techs. Int'l, Inc., CBM2015-00179, -00181, and -
	00182, June 17, 2016.
1056	Certified English Translation of Exhibit No. 4 from the Deposition
	of Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
	CBM2015-00179, -00181, and -00182, June 17, 2016.
1057	Certification of Translation of Exhibit No. 4 from the Deposition of
	Atushi Kawashima, IBG, LLC et al. v. Trading Techs. Int'l, Inc.,
1050	CBM2015-00179, -00181, and -00182, June 17, 2016.
1058	Deposition Transcript of Christopher H. Thomas, IBG LLC et al. v.
	Trading Techs. Int'l, Inc., CBM2016-00087, May 8, 2017.

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