

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Trading Technologies International, Inc.,)	
)	
Plaintiff,)	Civil Action No. 10-CV-726
)	
v.)	Judge William J. Hibbler
)	
Cunningham Trading Systems, LLC, and)	Magistrate Judge Nan R. Nolan
Cunningham Commodities, LLC,)	
)	
Defendants.)	
)	

SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT AND JURY DEMAND

Plaintiff Trading Technologies International, Inc. (“Trading Technologies”), for its second amended complaint against Defendants Cunningham Trading Systems, LLC (“CTS”) and Cunningham Commodities, LLC (“Cunningham Commodities”), (collectively “Cunningham”), states as follows:

THE PARTIES

1. Plaintiff Trading Technologies is a Delaware Corporation with a principal place of business at 222 South Riverside Plaza, Suite 1100, Chicago, Illinois 60606.
2. Defendant CTS is an Illinois Limited Liability Company with its headquarters and principal place of business at 141 West Jackson Boulevard, Suite 211A, Chicago, IL 60604.
3. Defendant Cunningham Commodities is an Illinois Limited Liability Company with its headquarters and principal place of business at 141 West Jackson Boulevard, Suite 211A, Chicago, IL 60604. Assumed names under which Cunningham Commodities does business include “5DollarFutures.com” and “Cunningham Futures Clearing.”

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the acts of Congress relating to patents, namely the Patent Laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court thereby has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Defendants have a principal place of business in this district and regularly conduct business in this district. Defendants provide trading software products, including at a minimum T4 Desktop client software, that provide access to exchanges in this district, including the Chicago Board of Trade (“CBOT”) and the Chicago Mercantile Exchange (“CME”). *See, e.g.*, Exhibit A. This Court has jurisdiction generally over Defendants.

6. Defendants have committed and continue to commit acts of patent infringement in this district, through the manufacturing, sale, offer for sale, and/or use of the T4 Desktop client software, *see, e.g.*, Exhibit A. Therefore, this Court has specific jurisdiction over the Defendants.

7. Defendants CTS and Cunningham Commodities reside in this district, because they are subject to personal jurisdiction in this district. Therefore, this District is a proper venue pursuant to 28 U.S.C. §§ 1391(b) and 1400(b).

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,766,304

8. Plaintiff Trading Technologies incorporates paragraphs 1-7 as if set forth in full.

9. Plaintiff Trading Technologies is the owner of U.S. Patent No. 6,766,304 (“the ‘304 patent”), titled “Click Based Trading with Intuitive Grid Display of Market Depth,” which was duly and legally issued on July 20, 2004. A true and correct copy of the ‘304 patent is attached as Exhibit B.

10. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '304 patent.

11. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '304 patent or otherwise authorized Defendants Cunningham to practice the '304 patent.

12. Defendants Cunningham have infringed and continue to infringe the '304 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '304 patent without Plaintiff Trading Technologies' authorization, in violation of 35 U.S.C. § 271(a).

13. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of manuals, release notes and tutorials. *See, e.g.*, Ex. A.

14. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

15. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '304 patent in violation of 35 U.S.C. §271(b) and (c).

16. Defendants' infringement of the '304 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT II:
INFRINGEMENT OF U.S. PATENT NO. 6,772,132**

17. Plaintiff Trading Technologies incorporates paragraphs 1-16 as if set forth in full.

18. Plaintiff Trading Technologies is the owner of U.S. Patent No. 6,772,132 (“the ‘132 patent”), titled “Click Based Trading with Intuitive Grid Display of Market Depth,” which was duly and legally issued on August 3, 2004. A true and correct copy of the ‘132 patent is attached as Exhibit C.

19. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the ‘132 patent.

20. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the ‘132 patent or otherwise authorized Defendants Cunningham to practice the ‘132 patent.

21. Defendants Cunningham have infringed and continue to infringe the ‘132 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the ‘132 patent without Plaintiff Trading Technologies’ authorization, in violation of 35 U.S.C. § 271(a).

22. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants’ promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

23. Defendants’ products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

24. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '132 patent in violation of 35 U.S.C. §271(b) and (c).

25. Defendants' infringement of the '132 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT III:
INFRINGEMENT OF U.S. PATENT NO. 7,212,999**

26. Plaintiff Trading Technologies incorporates paragraphs 1-25 as if set forth in full.

27. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,212,999 ("the '999 patent"), titled "User Interface for an Electronic Trading System," which was duly and legally issued on May 1, 2007. A true and correct copy of the '999 patent is attached as Exhibit D.

28. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '999 patent.

29. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '999 patent or otherwise authorized Defendants Cunningham to practice the '999 patent.

30. Defendants Cunningham have infringed and continue to infringe the '999 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '999 patent without Plaintiff Trading Technologies' authorization, in violation of 35 U.S.C. § 271(a).

31. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com,

www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

32. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

33. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '999 patent in violation of 35 U.S.C. §271(b) and (c).

34. Defendants' infringement of the '999 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT IV:
INFRINGEMENT OF U.S. PATENT NO. 7,412,416**

35. Plaintiff Trading Technologies incorporates paragraphs 1-34 as if set forth in full.

36. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,412,416 ("the '416 patent"), titled "User Interface for an Electronic Trading System," which was duly and legally issued on Aug. 12, 2008. A true and correct copy of the '416 patent is attached as Exhibit E.

37. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '416 patent.

38. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '416 patent nor otherwise authorized Defendants Cunningham to practice the '416 patent.

39. Defendants Cunningham have infringed and continue to infringe the '416 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '416 patent without Plaintiff Trading Technologies' authorization, in violation of 35 U.S.C. § 271(a).

40. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

41. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

42. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '416 patent in violation of 35 U.S.C. §271(b) and (c).

43. Defendants' infringement of the '416 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT V:
INFRINGEMENT OF U.S. PATENT NO. 7,533,056**

44. Plaintiff Trading Technologies incorporates paragraphs 1-43 as if set forth in full.

45. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,533,056 ("the '056 patent"), titled "User Interface for an Electronic Trading System," which was duly and legally issued on May 12, 2009. A true and correct copy of the '056 patent is attached as Exhibit F.

46. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '056 patent.

47. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '056 patent or otherwise authorized Defendants Cunningham to practice the '056 patent.

48. Defendants Cunningham have infringed and continue to infringe the '056 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '056 patent without Plaintiff Trading Technologies' authorization, in violation of 35 U.S.C. § 271(a).

49. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

50. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

51. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '056 patent in violation of 35 U.S.C. §271(b) and (c).

52. Defendants' infringement of the '056 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT VI:
INFRINGEMENT OF U.S. PATENT NO. 7,587,357**

53. Plaintiff Trading Technologies incorporates paragraphs 1-52 as if set forth in full.

54. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,587,357 (“the ‘357 patent”), titled “Repositioning of Market Information on Trading Screens,” which was duly and legally issued on September 8, 2009. A true and correct copy of the ‘357 patent is attached as Exhibit G.

55. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the ‘357 patent.

56. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the ‘357 patent or otherwise authorized Defendants Cunningham to practice the ‘357 patent.

57. Defendants Cunningham have infringed and continue to infringe the ‘357 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the ‘357 patent without Plaintiff Trading Technologies’ authorization, in violation of 35 U.S.C. § 271(a).

58. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants’ promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

59. Defendants’ products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

60. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '357 patent in violation of 35 U.S.C. §271(b) and (c).

61. Defendants' infringement of the '357 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT VII:
INFRINGEMENT OF U.S. PATENT NO. 7,613,651**

62. Plaintiff Trading Technologies incorporates paragraphs 1-61 as if set forth in full.

63. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,613,651 ("the '651 patent"), titled "Repositioning of Market Information on Trading Screens," which was duly and legally issued on November 3, 2009. A true and correct copy of the '651 patent is attached as Exhibit H.

64. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '651 patent.

65. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '651 patent or otherwise authorized Defendants Cunningham to practice the '651 patent.

66. Defendants Cunningham have infringed and continue to infringe the '651 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '651 patent without Plaintiff Trading Technologies' authorization, in violation of 35 U.S.C. § 271(a).

67. Defendants Cunningham have in the past and continue to promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com,

www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

68. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

69. Defendants' actions have and continue to constitute active inducement of and contributory infringement of the '651 patent in violation of 35 U.S.C. §271(b) and (c).

70. Defendants' infringement of the '651 patent has caused irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT VIII:
INFRINGEMENT OF U.S. PATENT NO. 7,676,411**

71. Plaintiff Trading Technologies incorporates paragraphs 1-70 as if set forth in full.

72. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,676,411 ("the '411 patent"), titled "Click Based Trading with Intuitive Grid Display of Market Depth," which duly and legally issued on March 9, 2010. A true and correct copy of the '411 patent is attached as Exhibit I.

73. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to the '411 patent.

74. Defendants Cunningham infringe the '411 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '411 patent without Plaintiff Trading Technologies' authorization in violation of 35 U.S.C. § 271(a).

75. Defendants Cunningham promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum,

maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

76. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

77. Defendants' actions constitute active inducement of and contributory infringement of the '411 patent in violation of 35 U.S.C. §271(b) and (c).

78. Defendants' infringement of the '411 patent causes irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT IX:
INFRINGEMENT OF U.S. PATENT NO. 7,725,382**

79. Plaintiff Trading Technologies incorporates paragraphs 1-78 as if set forth in full.

80. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,725,382 ("the '382 patent"), titled "Click Based Trading with Intuitive Grid Display of Market Depth," which was duly and legally issued on May 25, 2010. A true and correct copy of the '382 patent is attached as Exhibit J.

81. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to '382 patent.

82. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '382 patent or otherwise authorized Defendants Cunningham to practice the '382 patent.

83. Defendants Cunningham infringe the '382 patent by making, using, selling and/or

offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '382 patent without Plaintiff Trading Technologies' authorization in violation of 35 U.S.C. § 271(a).

84. Defendants Cunningham promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

85. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

86. Defendants' actions constitute active inducement of and contributory infringement of the '382 patent in violation of 35 U.S.C. §271(b) and (c).

87. Defendants' infringement of the '382 patent causes irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT X:
INFRINGEMENT OF U.S. PATENT NO. 7,693,768**

88. Plaintiff Trading Technologies incorporates paragraphs 1-87 as if set forth in full.

89. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,693,768 ("the '768 patent"), titled "Click Based Trading with Intuitive Grid Display of Market Depth," which was duly and legally issued on April 6, 2010. A true and correct copy of the '768 patent is attached as Exhibit K.

90. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to '768 patent.

91. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '768 patent or otherwise authorized Defendants Cunningham to practice the '768 patent.

92. Defendants Cunningham infringe the '768 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '768 patent without Plaintiff Trading Technologies' authorization in violation of 35 U.S.C. § 271(a).

93. Defendants Cunningham promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

94. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

95. Defendants' actions constitutes active inducement of and contributory infringement of the '768 patent in violation of 35 U.S.C. §271(b) and (c).

96. Defendants' infringement of the '768 patent causes irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

**COUNT XI:
INFRINGEMENT OF U.S. PATENT NO. 7,813,996**

97. Plaintiff Trading Technologies incorporates paragraphs 1-96 as if set forth in full.

98. Plaintiff Trading Technologies is the owner of U.S. Patent No. 7,813,996 ("the '996 patent"), titled "Click Based Trading with Intuitive Grid Display of Market Depth," which was duly and

legally issued on October 12, 2010. A true and correct copy of the '996 patent is attached as Exhibit L.

99. Plaintiff Trading Technologies is in compliance with any applicable marking and notice provisions of 35 U.S.C. § 287, with respect to '996 patent.

100. Plaintiff Trading Technologies has never licensed Defendants Cunningham under the '996 patent or otherwise authorized Defendants Cunningham to practice the '996 patent.

101. Defendants Cunningham infringe the '996 patent by making, using, selling and/or offering for sale products, including at a minimum the CTS T4 Desktop client software, covered by claims of the '996 patent without Plaintiff Trading Technologies' authorization in violation of 35 U.S.C. § 271(a).

102. Defendants Cunningham promote, advertise, and instruct customers and potential customers about the CTS T4 Desktop client software products and uses of the products, including infringing uses. Defendants' promotion, advertising, and instruction efforts include, at a minimum, maintenance of the websites www.ctsfutures.com, www.cunninghamllc.com, www.cunninghamfc.com, and www.5dollarfutures.com and distribution of release notes and tutorials. *See, e.g.*, Ex. A.

103. Defendants' products are not staple articles or commodities of commerce suitable for substantial non-infringing use.

104. Defendants' actions constitutes active inducement of and contributory infringement of the '996 patent in violation of 35 U.S.C. §271(b) and (c).

105. Defendants' infringement of the '996 patent causes irreparable harm to Plaintiff Trading Technologies and will continue to do so unless enjoined.

RELIEF REQUESTED

THEREFORE, Plaintiff Trading Technologies prays for judgment and relief including:

(A) Judgment that Defendants CTS and Cunningham Commodities have been and are infringing one or more of the claims of the ‘304, ‘132, ‘999, ‘416, ‘056, ‘357, ‘651, ‘411, ‘382, ‘768 and ‘996 patents pursuant to 35 U.S.C. §§ 271(a), (b), and/or (c);

(B) A preliminary and permanent injunction enjoining Defendants CTS and Cunningham Commodities and their officers, agents, servants, employees, attorneys, related business entities and those in active concert or participation with them from infringing the ‘304, ‘132, ‘999, ‘416, ‘056, ‘357, ‘651, ‘411, ‘382, ‘768 and ‘996 patents;

(C) An award of damages incurred by Plaintiff Trading Technologies as a result of Defendants’ infringement of the ‘304, ‘132, ‘999, ‘416, ‘056, ‘357, ‘651, ‘411, ‘382, ‘768 and ‘996 patents;

(D) An assessment of costs, including reasonable attorney fees pursuant to 35 U.S.C. § 285, and prejudgment interest against Defendants CTS and Cunningham Commodities; and

(E) Such other and further relief as this Court may deem just and proper.

JURY DEMAND

Plaintiff Trading Technologies demands trial by jury on all issues so triable.

Respectfully submitted,

Date: January 3, 2011

By: s/ Kirsten L. Thomson
Leif R. Sigmond, Jr. (ID No. 6204980)
(sigmond@mbhb.com)
Matthew J. Sampson (ID No. 6207606)
(sampson@mbhb.com)

Michael D. Gannon (ID No. 6206940)
(gannon@mbhb.com)

S. Richard Carden (ID No. 6269504)
(carden@mbhb.com)

Jennifer M. Kurcz (ID No. 6279893)
(kurcz@mbhb.com)

Kirsten L. Thomson (ID No. 6293943)
(thomson@mbhb.com)

McDonnell Boehnen Hulbert & Berghoff LLP

300 South Wacker Drive

Chicago, Illinois 60606

Tel.: (312) 913-0001

Fax: (312) 913-0002

Steven F. Borsand (ID No. 6206597)
(Steve.Borsand@tradingtechnologies.com)

Trading Technologies International, Inc.

222 South Riverside

Suite 1100

Chicago, IL 60606

Tel: (312) 476-1000

Fax: (312) 476-1182

**Attorneys for Plaintiff,
TRADING TECHNOLOGIES
INTERNATIONAL, INC.**