

## Exhibit B-1

### **Invalidity of the U.S. Patent No. 6,415,280 Over U.S. Pat. No. 5,649,196 to Woodhill et al.**

Each of the Asserted Claims is anticipated by United States Patent No. 5,649,196 to Woodhill et al. (“Woodhill”), which issued on July 15, 1997, is a continuation of U.S. Patent App. No. 08/085,596, filed on July 1, 1993, and thus is available as prior art at least under 35 USC § 102(e).

To the extent PersonalWeb contends that Woodhill does not meet one or more limitations of the Asserted Claims, the claims are obvious over the Woodhill patent, alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein including any of the following:

- Langer, “Re: dl/describe (File descriptions)”, was an article posted to the “alt.sources” newsgroup on August 7, 1991 (“Langer”), and thus is available as prior art at least under 35 USC § 102(b).

The charts below provide representative examples of where specifically each element of each asserted claim is found within Woodhill and the other references, at least under PersonalWeb’s apparent construction of the Asserted Claims as applied in PersonalWeb’s infringement contentions. The charts also identify, for each element governed by 35 U.S.C. § 112, ¶ 6, the structure(s), act(s), or material(s) that performs the claimed function in the prior art references. The charts also identify, for combinations of prior art items that make a claim obvious, the motivation to combine such items.

The cited portions of the prior art references are only examples, and Defendants reserve the right to rely on any further uncited portions of the prior art references as additional evidence that the references disclose and/or render obvious a claim limitation.

The '280 Patent Claims	U.S. Pat. No. 5,649,196 to Woodhill et al.
<p>[36a] A method of delivering a data file in a network comprising a plurality of processors, some of the processors being servers and some of the processors being clients, the method comprising:</p>	<p><b>Woodhill discloses a method of delivering a data file in a network comprising a plurality of processors, some of the processors being servers and some of the processors being clients. For example, the data processing system of Woodhill includes a remote backup file server and one or more local computers (clients and servers) connected to one or more local area networks. For example:</b></p> <p>“FIG. 1 illustrates a simplified representation of a typical networked computer system 10 in which the system and method of the present invention for distributed storage management on networked computer systems may be employed. A remote backup file server 12 is in communication, via data path 13, with a wide area network 14. The wide area network 14 is, in turn, in communication with a plurality of local area networks 16 via data paths 15. Those of ordinary skill in the art will recognize that any number of wide area networks 14 may be in communication with remote backup file server 12 and that any number of local area networks 16 (from 1 to more than 100) may be in communication with each wide area network 14. Those of ordinary skill in the art will also recognize that the means for communication between remote backup file server 12, wide area network 14 and local area networks 16 over data paths 13 and 15 is well known.</p> <p>Each local area network 16 includes multiple user workstations 18 and local computers 20 each in communication with their respective local area network 16 via data paths 17. Again, those of ordinary skill in the art will recognize that the means for communication between user workstations 18, local computers 20 and local area networks 16 via data paths 17 is well known.” (Woodhill at col. 3, lines 6-31).</p> <p><i>See also</i> Woodhill at ‘Field of Invention,’ col. 1, line 66- col. 2, line 49, col. 3, lines 6-67, col. 4, line 62 – col. 5, line 11, col. 5, lines 13-20, col. 9, lines 30-44, and Figures 1 and 2.</p>

The '280 Patent Claims	U.S. Pat. No. 5,649,196 to Woodhill et al.
<p>[36b] storing the data file is [sic] on a first server in the network and storing copies of the data file on a set of servers in the network distinct from the first server; and</p>	<p><b>Woodhill discloses storing the data file on a first server in the network and storing copies of the data file on a set of servers in the network distinct from the first server. For example, the data processing system runs a Backup/Restore routine on each local computer. During operation of this program, binary objects (data files) are stored somewhere on the local area network other than the local computer being backed up and on the remote backup server (servers). For example:</b></p> <p>“The Distributed Storage Manager program 24 performs two concurrent backup operations. In most cases, the Distributed Storage Manager program 24 stores a compressed copy of every binary object it would need to restore every disk drive 19 on every local computer 20 somewhere on the local area network 16 other than on the local computer 20 on which it normally resides. At the same time, the Distributed Storage Manager program 24 transmits every new or changed binary object to the remote backup file server 12.” (Woodhill at col. 9, lines 30-38).</p> <p><i>See also</i> element [36a].</p> <p><b>To the extent PersonalWeb contends that the limitation of “storing the data file is [sic] on a first server and storing copies of the data file on a set of servers distinct from the first server” is not met by Woodhill, a person of ordinary skill in the art would have found it obvious to modify Woodhill to meet that limitation. For example, it would have been obvious to add an additional remote backup file server or servers to Woodhill’s system for additional data security. Adding additional remote backup file servers to Woodhill would constitute applying a known technique to a known device, method, or product ready for improvement to yield predictable results, and therefore it would be obvious to a person of ordinary</b></p>

The '280 Patent Claims	U.S. Pat. No. 5,649,196 to Woodhill et al.
	skill in the art exercising ordinary creativity.
<p>[36c] responsive to a client request for the data file, the request including a hash of the contents of the data file, causing the data file to be provided to the client.</p>	<p><b>Woodhill discloses, responsive to a client request for the data file, the request including a hash of the contents of the data file, causing the data file to be provided to the client. For example, the data processing system of Woodhill allows restores (client request) of binary objects (data files) using their Binary Object Identifiers during the Backup/Restore Routine. Also, the data processing system of Woodhill performs periodic self-audits by initiating a restore of a randomly selected binary object, identified by its Binary Object Identification Record, which includes its Binary Object Identifier. A Binary Object Identifier includes a hash value calculated by a hash function of the contents of the binary object that it identifies. For example:</b></p> <p>“Since most restores of files on a local area network 16 consist of requests to restore the most recent backup version of a file, 30 the local copies of binary objects serve to handle very fast restores for most restore requests that occur on the local area network 16.” (Woodhill at col. 10, lines 27 – 32).</p> <p><b>Binary objects backed up by a local computer are requested from another local computer or from the remote backup file server using their Binary Object Identification Record, which includes their Binary Object Identifier, to identify them. For example:</b></p> <p>“The Distributed Storage Manager program 24 is able to perform self-audits on a periodic basis to ensure that the binary objects that have been backed up can be restored. To perform an audit, the Distributed Storage Manager program 24 executes the steps illustrated in the flow chart of FIG. 5j. Program control begins at step 500 where the Distributed Storage Manager program 24 initiates a restore of a randomly selected binary object identified by a Binary Object Identification Record 58 stored in File</p>

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	<p>Database 25. Program control continues with step 502 where the selected binary object is restored from either a compressed storage file 32 residing on one of the disk drives 19 of one of the local computers 20 or from the remote backup file server 12.” (Woodhill patent at col. 18, lines 11-23).</p> <p>“In step 138, a Binary Object Identification Record 58 is created in File Database 25 for each of the binary objects currently being processed. Each of these Binary Object Identification Records 58 are associated with the Backup Instance Record 42 created in step 130. The Binary Object Identifier 74 portion of each Binary Object Identification Record 58 is comprised of the Binary Object Size field 64, the Binary Object CRC32 field 66, the Binary Object LRC field 68 and the Binary Object Hash field 70. Each of the fields of the Binary Object Identifier 74 may be four (4) bytes in length and is calculated from the contents of each binary object. The Binary Object Size field 64 may be set equal to the byte-size of the binary object. The Binary Object CRC32 field 66 may be set equal to the standard 32-bit Cyclical Redundancy Check number calculated against the contents of the binary object taken one (1) byte (8 bits) at a time. Those of ordinary skill in the art will readily recognize the manner in which the Cyclical Redundancy Check number is calculated. The Binary Object LRC field 68 may be set equal to the standard Longitudinal Redundancy Check number calculated against the contents of the binary object taken four (4) bytes (32 bits) at a time using the following algorithm:</p> <hr/> <pre> BiNARY OBJECT LRC = (initialized value) for each double word (32 bits) of the binary object data:   LRC = LRC (XOR) double word of binary object data end loop </pre> <hr/> <p>The Binary Object Hash field 70 is calculated against the contents of the binary object taken one (1) word (16 bits) at a time using the following algorithm:</p>

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