Exhibit B-51

Invalidity of U.S. Patent No. 6,415,280 over the LIFN Prior Art

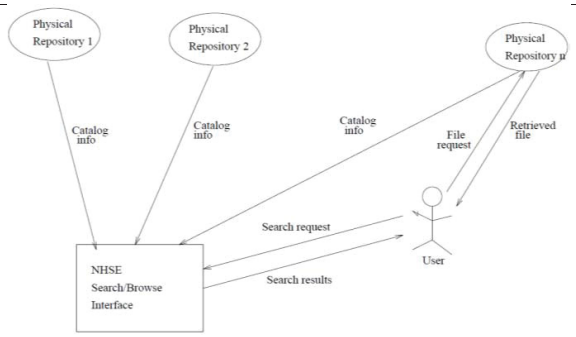
Each of the Asserted Claims is anticipated by each of:

S. Browne et al., "Location-Independent Naming for Virtual Distributed Software Repositories," University of Tennessee Technical Report CS-95-278 (Feb. 1995) ("Browne 1995"), which is available as prior art at least under 35 U.S.C. § 102(a);

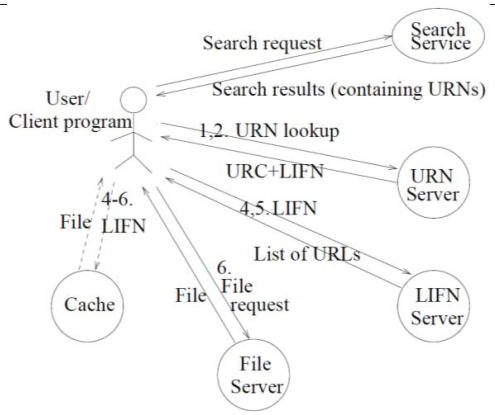
- S. Browne et al., "Location-Independent Naming for Virtual Distributed Software Repositories," http://www.netlib.org/utk/papers/lifn/main.html (Nov. 11, 1994) ("Browne 1994"), which is available as prior art at least under 35 U.S.C. § 102(a); and
- K. Moore et al., "An Architecture for Bulk File Distribution," Network Working Group Internet Draft (July 27, 1994) ("Moore 1994"), which *is* available as prior art at least under 35 U.S.C. § 102(a)
- (collectively, "the LIFN Prior Art"). All references to "the LIFN Prior Art" herein should be understood to refer to each of the references individually.
- To the extent PersonalWeb contends that the LIFN Prior Art does not meet one or more limitations of the Asserted Claims, the claims are obvious over the LIFN Prior Art, alone or in combination with each other, 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 one or more of the following:
- Albert Langer, "Re: dl/describe (File descriptions)," article <1991Aug7.225159.786@newshost.anu.edu.au> in Usenet newsgroups "alt.sources.d" and "comp.archives.admin" (August 7, 1991) ("Langer") is available as prior art at least under 35 U.S.C. § 102(b).
- U.S. Patent No. 5,649,196 to Woodhill et al. ("Woodhill") claims priority to a U.S. patent application filed on Jul. 1, 1993, and therefore is available as prior art at least under 35 U.S.C. § 102(e).

The charts below provide representative examples of where specifically each element of each asserted claim is found within the LIFN Prior Art and 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. 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	The LIFN Prior Art
[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:	**The LIFN Prior Art 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 LIFN Prior Art discusses the distribution of data files over a network that comprises a plurality of LIFN servers, file servers (e.g., mirror sites and/or cache sites), and clients, all of which are processors.** "A location-independent naming system for network resources has been designed to facilitate organization and description of software components accessible through a virtual distributed repository. . . . This paper details the design of the naming system, describes a prototype implementation of some of the capabilities, and describes how the system fits into the development of the National HPCC Software Exchange, a virtual software repository that has the goal of providing access to reusable software components for high-performance computing." Browne 1995 at 1 (abstract). "Well-maintained software repositories are central to software reuse because they make high-quality software widely available and easily accessible. One such repository is Netlib, a collection of high-quality publicly available mathematical software [6, 4]. Netlib, in operation since 1985, currently processes over 300,000 requests a day. Netlib is serving as a prototype for development of the National HPCC Software Exchange (NHSE), which has the goal of encompassing all High Performance Computing Consortium (HPCC) software repositories and of promoting reuse of software components developed by Grand Challenge and other scientific computing researchers [5]." Browne 1995 at 1 (footnotes omitted). "Growth in the popularity of the Internet and the World Wide Web, as well as the wide availability of WWW client and server software, has accelerated the shift from centrally maintained software repositories to virtual, distributed repositories. For example, the GAMS Repository, once a central repository, is now a virtual repository that catalogs software maintained by other repositories [2]. Similarly, the NHSE will provide a uniform interface to a virtual HPCC software repository that will be built on top of a distributed set of discipline-oriented repositories [5], as shown in Figure 1." Browne 1995 at 1. *See also* Browne 1995, Figure 1:

The '280 Patent Claims	The LIFN Prior Art
	 Figure 1: Virtual Repository Architecture "The main advantage of distributing a repository is to allow the software to be maintained by those in the best position to keep it up-to-date. Also, copies of popular software packages may be mirrored by a number of sites to increase availability (e.g., if one site is unreachable, the software may be retrieved from a different site) and to prevent bottlenecks." Browne 1995 at 1–2. "The WWW mechanism of specifying a file by its Uniform Resource Locator (URL) is inadequate for ensuring the consistency and currency of mirrored copies, as a URL for an independently mirrored copy of a software package may point to an out-of-date copy and give no indication that it is not up-to-date. Furthermore, mirror copies of a file cannot be located from a URL reference, since each copy has a different URL." Browne 1995 at 2. "Higher-level names allow for long-lived human-readable references, while lower-level names permit reliable caching and mirroring as well as permitting precise references when needed. Location-independent names will be the basis of transparent mirroring." Browne 1995 at 2. "It has been widely recognized that a solution to the above problems is to assign location-independent names to files and to provide a name-to-location service that, given a name, returns a list of locations for that name. A resource provider who moves some files need only delete the

The '280 Patent Claims	The LIFN Prior Art
	old name-to-location bindings and register the new bindings with the name-to-location service. Likewise, a site that mirrors a copy of a file need only register its location with the name-to-location service. Then a user attempting to retrieve the file corresponding to a location-independent name may query the name-to-location service for a list of alternative locations to be tried." Browne 1995 at 3. "We divide the file access system into two levels. The upper level is where publishing, cataloging, and searching activities take place. These upper-level activities are concerned with the semantic, or intellectual, contents of files. The lower level is where distribution, mirroring, and caching activities occur." Browne 1995 at 3–4. "For a name to be useful, there must be some means of resolving a name to a location from which the resource can be retrieved or accessed. Thus, the publisher, as well as any other parties that mirror the resource, must register such locations with the appropriate name-to-location lookup services." Browne 1995 at 4. "[T]he steps involved in resolving a URN so as to access a copy of the file it names are as follows, as shown in Figure 3: 1. Use DNS to locate an appropriate URN server. 2. Query the URN server to retrieve the URC which contains the currently associated LIFN. 3. Authenticate the URC if desired. 4. Use DNS to locate an appropriate LIFN server. 5. Query the LIFN server to retrieve a list of locations. 6. Choose a location from which to retrieve the file." Browne 1995 at 5. *See also* Browne 1995, Figure 3:

The '280 Patent Claims	The LIFN Prior Art
	 Figure 3: File access steps "A file server can mirror a file by acquiring a copy of it and posting an update to a LIFN server for the file's naming authority." Browne 1995 at 5. "One of the most important aspects of our use of LIFNs is that it assures the user of retrieving the most up-to-date copy of a file referenced by a URN, without the overhead of a replica control protocol between file servers mirroring that file, which in general will not all be under the control of the URN's naming authority. This assurance is modulo the time required for the master-slave update protocol for the replicated URN servers, but if the user insists on contacting the master URN server, he is ensured of getting the most up-to-date copy." Browne 1995 at 5. "[A] LIFN server returns a list of locations for a given LIFN but does not guarantee the correctness of those locations. A location may be incorrect if it no longer exists or if the contents of that location are wrong. In the former case, no file will be returned from that location. The latter condition may be detected by the client performing an integrity check." Browne 1995 at 5. "The naming system is being implemented as part of the Bulk File Distribution (BFD) package.

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