

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PERFECT CORP.,

Petitioner,

v.

ZUGARA, INC.,

Patent Owner.

PTAB Case No. IPR2025-01144

Patent No. 10,482,517

**DECLARATION OF DAVID HAUGEN IN SUPPORT OF *INTER PARTES*
REVIEW OF U.S. PATENT NO. 10,482,517**

I. INTRODUCTION

I, David Haugen, am over the age of 18, and provide this declaration freely. This declaration is based on my personal knowledge, and the information contained herein is true and accurate.

I am currently employed at CyberLink Corp. (“CyberLink”) in Taiwan. I have been an employee at CyberLink for the past 19 years. My current position is the Assistant Product Manager for the Product Commercialization team at CyberLink. The Product Commercialization team is responsible for, among other things, the creation and maintenance of product documentation at CyberLink.

Relevant to this declaration, in late 2008 through early 2010, I held the position of Technical Writer. In that role, I was responsible for, among other things, uploading documentation onto CyberLink’s website, confirming the publishing of this documentation, and maintaining records related to the documentation associated with CyberLink’s products. These products included CyberLink’s YouCam products, including YouCam 3.0, and updates to YouCam 3.0 such as version 3.1.

II. YOUCAM 3.0 USER GUIDE

CyberLink’s third major release of YouCam was version 3.0 (“YouCam 3.0”). It was released on June 15, 2009, https://www.cyberlink.com/eng/press_room/view_2196.html.

When YouCam 3.0 was released, it was released with the YouCam 3.0 User's Guide. I was personally involved in the creation of the YouCam 3.0 User's Guide.

By February 27, 2009, work was well underway on the YouCam 3.0 User's Guide. Exhibit 1041 is a true and correct copy of a February 27, 2009, email I received from my colleague Begona Chung at CyberLink providing me comments (in the included attachment to the email) on an early draft of the YouCam 3.0 User's Guide I had previously provided to her. Exhibit 1042 is a true and correct copy of an email I received that shows continued work on the YouCam 3.0 User's Guide in early March, 2009.

On June 10, 2009, I personally uploaded a copy of the completed YouCam 3.0 User's Guide to an FTP folder on CyberLink's server, which is the initial step in publishing documents on CyberLink's website. Exhibit 1043 is a true and correct copy of CyberLink's backend system corroborating my upload on June 10, 2009. This is also the date that I set up the YouCam 3.0 User's Guide download webpage on CyberLink's website which further corroborates my uploading of the User's Guide on this date. This setup included my inputting the correct URL's to the uploaded user's guides as shown in Exhibit 1044, a true and correct copy of a screenshot of CyberLink's back-end server. Exhibit 1006 is a true and correct copy of the final YouCam 3.0 User's Guide that was uploaded to CyberLink's website on June 10, 2009. Exhibit 1045 is a screenshot from CyberLink's current storage server

that shows a copy of this original June 10, 2009, version of the YouCam 3.0 User's Guide. I have familiarity with CyberLink's backend system, and how documents are stored and maintained in the regular course of business. All of these records were stored in the ordinary course of business.

Between June 12 and June 19 2009, the version of the YouCam 3.0 User's Guide I had uploaded on June 10, 2009, along with copies of the user's guide in 8 other languages, were released and published to the public at https://assist.cyberlink.com/pc-doc/user_guide/youcam/3/enu/YouCam.pdf. The YouCam 3.0 User's Guide was available to the general public with no restrictions on access to the guide. The screenshot contained at Exhibit 1044 from CyberLink's backend system demonstrates the intended release date of June 12, 2009 to the public of YouCam 3.0 User's Guide. These records, like all the others discussed in this declaration, were stored in the ordinary course of business on CyberLink's backend system. In addition, Exhibit 1039 is a true and correct copy of a June 19, 2009, email I received from my colleague Stuart Hill further confirming that the version of the YouCam 3.0 User's Guide I had previously uploaded was published to the general public.

As I previously mentioned, the version of the YouCam 3.0 User's Guide that was made available to the public in June 2009 is contained at Exhibit 1006. Subsequently in late 2009, at the request of the product manager for YouCam 3.1

(an update to version 3.0), changes were made to the user's guide, in November and December of 2009, and this new version of the user's guide (with a 2010 copyright) replaced the original 2009 version on CyberLink's website at https://assist.cyberlink.com/pc-doc/user_guide/youcam/3/enu/YouCam.pdf. This occurred on or about January 14, 2010. A true and correct copy of an email I received in the ordinary course of business on November 30, 2009, from my colleague Tom Tang at CyberLink is contained at Exhibit 1046. This email shows work being doing on the soon to be updated version of YouCam 3.0 (version 3.1), including to the User's Guide. The email also contains a GM ("Golden Master") date of January 14, 2010, which is the anticipated release date for the YouCam 3.1 update. I have personal knowledge that the 2010 YouCam User's Guide was actually released on January 14, 2010, or within a day or two of that date.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed at Taipei, Taiwan on JUNE 16, 2025

By: David Haugen

David Haugen