

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PERFECT CORP.,

Petitioner,

v.

ZUGARA, INC.,

Patent Owner.

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PTAB Case No. IPR2025-01144

Patent No. 10,482,517

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

I. INTRODUCTION

I, Manal Ma, 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 worked at CyberLink Corp. (“CyberLink”) in Taiwan for approximately 18 years, from September 7, 1998 until October 31, 2016. During this period I held several positions, all related to the marketing function at CyberLink.

Relevant to this declaration, between September 1, 2007 and May 1, 2011, I was CyberLink’s Vice President for Marketing and Customer Service. In that role, I was responsible for, among other things, marketing for CyberLink’s products, including its YouCam products such as YouCam 3.0. By marketing, I am referring to any written, audio, or visual marketing material that CyberLink would release to the public. This included press releases related to company news, such as the release of new products, and social media marketing including the dissemination about our products on sites such as YouTube. I would also review product literature, such as user guides, to make sure the company’s messaging was consistent.

II. YOUCAM 3.0

During my time at CyberLink, “YouCam” was one of the company’s products that I had marketing responsibility for. At a high level, YouCam is a webcam

software product that provides many features for enhancing webcam video, recording, and sharing.

CyberLink's third major release of YouCam was version 3.0 ("YouCam 3.0"). CyberLink released YouCam 3.0 on June 15, 2009. I personally worked on the press release for YouCam 3.0, and Ex. 1037 is a true and correct copy of that press release. This press release was available to the general public on CyberLink's website with no restrictions. A copy of this press release also remains on CyberLink's website at https://www.cyberlink.com/eng/press_room/view_2196.html. In addition, Ex. 1038 is an internal email that all employees, including to myself, received on June 16, 2009, announcing the release of YouCam 3. This email also included a copy of the press release.

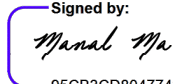
In addition to issuing a press release, on June 18, 2009, CyberLink posted a video on YouTube introducing YouCam 3.0 to a wider public audience. This YouTube video was and still is located at <https://www.youtube.com/watch?v=u6KVOe2WQgw>. I supervised the work on the content and creation of this YouTube video and can confirm that this link provides a true and correct copy of the video that was posted on June 18, 2009. I can also confirm that the effects shown in this YouTube video were actual effects created by using YouCam 3.0 and not any sort of post-editing or manipulation of the video.

The point of posting this YouCam 3.0 YouTube video was to disseminate information about the YouCam product to the public as widely as possible. This video was available to the general public, and access was not restricted in any way.

As part of CyberLink's customer support for YouCam 3.0, CyberLink provided its customers, and the public generally, a user guide for YouCam 3.0. I have reviewed Exhibit 1006, and I can confirm that this YouCam 3.0 User's Guide is the true and correct version that was published to CyberLink's customers on its website in June 2009 when YouCam 3.0 was released, and in the months following that release. This confirmation is based on my personal review of this document back in June of 2009, as well as my review of the document in preparing this declaration. Further, Exhibit 1039 is a true and correct copy of a June 19, 2009, email I received from my colleague Stuart Hill further confirming that this version of the YouCam 3.0 User Guide ("UG") was published to the general public by this date.

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

Executed at Vancouver, Canada on June, 16, 2025

By:  Signed by:
Manal Ma
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Manal Ma