

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PERFECT CORP.,
Petitioner,

v.

ZUGARA, INC.,
Patent Owner.

IPR2025-01144
U.S. Patent No. 10,482,517

EXHIBIT 2002

**Declaration Of Matthew Szymczyk In Support Of
Patent Owner's Brief Requesting Discretionary
Denial Under 35 U.S.C. § 325(d) And/Or § 314(a)**

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**DECLARATION OF MATTHEW SZYMCZYK IN SUPPORT OF PATENT
OWNER'S BRIEF REQUESTING DISCRETIONARY DENIAL UNDER 35
U.S.C. § 325(d) AND/OR § 314(a)**

Filed on behalf of Patent Owner by:

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ROZIER HARDT McDONOUGH PLLC

I, Matthew Szymczyk, declare as follows:

1. My name is Matthew Szymczyk and I am the CEO of Zugara, Inc., the Patent Owner of U.S. Pat. No. 10,482,517 (“the ’517 patent”).
2. Zugara was formed in 2001 as a Digital Marketing Agency. In 2008, Zugara shifted its focus to Augmented Reality technology.
3. As a pioneer in the AR (Augmented Reality) and VR (Virtual Reality) fields, Zugara developed award-winning Virtual Try-on Technology beginning in 2008 that was initially productized as The Webcam Social Shopper.
4. Over the ensuing years, Zugara continued to innovate in the AR field with virtual try-on technology deployments for companies such as Mattel, Major League Baseball, PayPal, Delta Airlines, Chick-fil-A, Crayola and others.
5. Zugara was a regular fixture at AR events and I often gave presentations of Zugara’s Virtual Try-on technology at conferences from the Augmented World Expo in San Jose to Ad:Tech Events in New York.
6. Zugara won a prestigious DEMOgod award for its technology at the 2011 DEMO conference and Zugara’s ’590 patent for virtual try-on technology was selected by the USPTO for the Smithsonian Innovation Festival in 2015.
7. Zugara has directly notified approximately one hundred and fifty companies about the existence of the ’517 patent family.
8. Several customers of Petitioner were first contacted and notified of the

parent of the Challenged Patent in 2013.

9. Since 2013, Zugara contacted at least sixteen customers of Perfect Corp. to alert them to the existence of the '517 patent family.

10. The Perfect Corp. customers that Zugara has contacted included Alibaba Group, Amazon.com, Inc., Burberry Group PLC, Meta Platforms, Inc., Google Inc., J.C. Penney Company, Inc., LVMH Moët Hennessy Louis Vuitton SA, Macy's, Inc., Rakuten Group, Inc., Shopify Inc., Simon Property Group, Snap, Inc., Target Corporation, Wal-Mart Stores, Inc., Wipro Technologies, and Yahoo! Inc.

DATED: September 16, 2025

By: 
Matthew Szymczyk