

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

**JOINT MOTION TO TERMINATE PROCEEDING
PURSUANT TO 35 U.S.C. § 317(a) AND 37 C.F.R. § 42.74**

EXHIBIT LIST

	Ex.1001	U.S. Patent No. 10,482,517, “Providing a Simulation of Wearing Items Such as Garments and/or Accessories,” to M. Szymczyk, et al. (the “’517 Patent”)
5	Ex.1002	Expert Declaration of Eli Saber, Ph.D. (“Saber”)
	Ex.1003	<i>Curriculum vitae</i> of Dr. Eli Saber
	Ex.1004	U.S. Patent No. 6,624,843, “Customer Image Capture and Use Thereof in a Retailing System,” to J. W. Lennon (“Lennon”)
10	Ex.1005	U.S. Patent No. 8,438,081, “Methods and Systems for Online Shopping,” to B. Gray, et al. (“Gray”)
	Ex.1006	YouCam 3 User’s Guide (“User’s Guide”)
	Ex.1007	YouCam 3 YouTube Publication Video (“Publication Video”)
	Ex.1008	U.S. Prov. Appl. No. 61/195,821, “Methods and Systems for Online Shopping” (“’821 Appl.”)
15	Ex.1009	U.S. Prov. Appl. No. 61/119,649, “Methods and Systems for Online Shopping” (“’649 Appl.”)
	Ex.1010	Prosecution History of the ’517 Patent
	Ex.1011	Estee Lauder Litigation Claim Chart
	Ex.1012	Transcript of YouCam 3 YouTube Publication Video
20	Ex.1013	Declaration of Han-Wei Chen
	Ex.1014-15 (Reserved)	
	Ex.1016	A. MURAT TEKALP, DIGITAL VIDEO PROCESSING (1995) (“Tekalp”)
	Ex.1017	DANA H. BALLARD & CHRISTOPHER M. BROWN, COMPUTER VISION (1982) (“Ballard”)

- Ex.1018 RICHARD HARTLEY & ANDREW ZISSERMAN, MULTIPLE VIEW
GEOMETRY IN COMPUTER VISION (2d ed. 2003) (“Hartley”)
- Ex.1019 IAIN E. G. RICHARDSON, VIDEO CODEC DESIGN: DEVELOPING IMAGE
AND VIDEO COMPRESSION SYSTEMS (2002) (“Richardson 2002”)
- 5 Ex.1020 IAIN E. G. RICHARDSON, H.264 AND MPEG-4 VIDEO COMPRESSION
(2003) (“Richardson 2003”)
- Ex.1021 LINDA SHAPIRO & GEORGE STOCKMAN, COMPUTER VISION (2000)
 (“Shapiro”)
- 10 Ex.1022 RAFAEL C. GONZALEZ & RICHARD E. WOODS, DIGITAL IMAGE
PROCESSING (2d ed. 2002) (“Gonzalez”)
- Ex.1023 Alper Yilmaz, et al., “Object Tracking: A Survey,” *ACM Computing
Surveys* 38(4): 1-45 (2006) (“Yilmaz”)
- 15 Ex.1024 Ming-Hsuan Yang, et al., “Detecting Faces in Images: A Survey,”
IEEE Transactions on Pattern Analysis and Machine Intelligence
24(1): 34-58 (2002) (“Yang”)
- Ex.1025 Sing Bing Kang, et al. “Image-Based Rendering,” *Foundations and
Trends in Computer Graphics and Vision* 2(3) (2006) (“Kang”)
- Ex.1026-35 (Reserved)
- Ex.1036 Declaration of Manal Ma (“Ma”)
- 20 Ex.1037 YouCam 3.0 June 15, 2009 Press Release (“Press Release”)
- Ex.1038 June 16, 2009 Email Announcing Release of YouCam 3.0 with Press
Release
- Ex.1039 June 19, 2009 Email from Stuart Hill to Manal Ma and David Haugen
Regarding Publishing of User’s Guide
- 25 Ex.1040 Declaration of David Haugen (“Haugen”)
- Ex.1041 February 27, 2009 Email from Begona Chung to David Haugen
Showing Work on User’s Guide

- Ex.1042 March 8, 2009 (and Earlier) Emails Received from David Haugen
Showing Continued Work on the User's Guide in Early 2009
- Ex.1043 CyberLink Backend Screenshot Showing Upload of User's Guide on
March 10, 2009
- 5 Ex.1044 YouCam 3.0 User's Guide Release Screenshot from CyberLink
Backend Server
- Ex.1045 CyberLink's Current Storage Server Showing a Copy of the June 10,
2009 User's Guide
- 10 Ex.1046 November 30, 2009 Email from Tom Tang to David Haugen
Regarding Updating the User's Guide for Version 3.1
- Ex.1047 Declaration of Yu Ching Wu ("Wu")
- Ex.1048 Backend Analytics from YouCam 3's YouTube Website
- Ex.1049 Confidential Settlement and License Agreement

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Petitioner Perfect Corporation and Patent Owner Zugara, Inc. (collectively, the “Parties”) jointly request termination of the inter partes review of U.S. Patent No. 10,482,517 (“the ’517 patent”), Case No. IPR2025-01144. The Board authorized this joint
5 motion by email dated October 28, 2025.

The Parties executed a Confidential Settlement and License Agreement (Ex. 1049) on October 16, 2025 to resolve all present disputes and to avoid any additional disputes regarding the ’517 patent. Accordingly, termination is appropriate because all disputes between the parties regarding the ’517 patent have been resolved.

10 Pursuant to 37 C.F.R. §§ 42.5 and 42.72, the Board may terminate a trial without rendering a final written decision where appropriate, including pursuant to a joint request under 35 U.S.C. §§ 317(a) or 327(a). *See Winplus N. Am., Inc. v. Pilot, Inc.*, IPR2018-00488, Paper 12 (P.T.A.B. Oct. 24, 2018). Further, termination of this IPR would promote efficiency and minimize unnecessary costs.

15 This proceeding is in its preliminary stages. Because the Board has not yet issued an institution decision, termination at this stage will conserve Board and party resources. 35 U.S.C. § 317(a); 77 Fed. Reg. 48768 (“The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.”). The Parties have settled their
20 dispute regarding the ’517 patent and respectfully submit that termination is proper

here. The Confidential Settlement and License Agreement is submitted concurrently herewith.

In accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), also submitted concurrently herewith is a Joint Request to Treat Confidential Settlement
5 and License Agreement as Business Confidential Information, for that Agreement to be kept separate from the file of the involved patent, and be made available only to the Federal Government agencies on written request, or to any person on showing of good cause under 35 U.S.C. § 317 and 37 C.F.R. § 42.74(c). A true and correct copy of the Confidential Settlement and License Agreement is submitted with that
10 Request as Confidential Exhibit 1049.

The Parties certify that there are no other agreements, oral or written, between the parties made in connection with, or in contemplation of, the termination of the proceeding. Patent owner has reviewed and joined this Motion.

CONCLUSION

For the foregoing reasons, the Parties jointly request that the Board terminate this proceeding in its entirety.

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Dated: November 6, 2025

Respectfully submitted,

By: /s/ Nicholas Thane Bauz

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing **JOINT MOTION TO TERMINATE PROCEEDING PURSUANT TO 35 U.S.C. § 317(a) AND 37 C.F.R. § 42.74** and Ex. 1049 were served on November 6, 2025, via electronic mail to the attorneys of record for Patent Owner in the litigation matters:

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