

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MIREILLE CARRIER, individually and on behalf of all others similarly situated,	PLAINTIFF(S)	CASE NUMBER	CV 07-02641 (CTx)
v. VALUECLICK, INC., a Delaware corporation, et al.	DEFENDANT(S).	ADR PILOT PROGRAM QUESTIONNAIRE	

(1) What, if any, discovery do the parties believe is essential in order to prepare adequately for a settlement conference or mediation? Please outline with specificity the type(s) of discovery and proposed completion date(s). Please outline any areas of disagreement in this regard. Your designations do not limit the discovery that you will be able to take in the event this case does not settle.

The parties have agreed that Defendants will provide Plaintiff with the following categories of information and documents on an informal basis, for the purpose of facilitating the parties' settlement discussions, during the week of January 7, 2008: (1) Information concerning Defendants' efforts to detect and remedy noncompliant software use on Commission Junction's ("CJ") networks; (2) documents concerning any analysis or summary of the commissions and fees resulting from noncompliant software use on CJ's networks; and (3) information concerning commissions earned by certain publishers believed to have engaged in noncompliant software use on CJ's networks during the relevant period. The parties agreed to exchange additional information on an informal basis at a meeting to take place between counsel, Plaintiff's expert and business and technical representatives of Defendants on 1/31/08.

(2) What are the damage amounts being claimed by each plaintiff? Identify the categories of damage claimed [e.g., lost profits, medical expenses (past and future), lost wages (past and future), emotional distress, damage to reputation, etc.] and the portion of the total damages claimed attributed to each category.

Plaintiff does not possess sufficient information to quantify damage amounts. Plaintiff identifies the following damages categories:

1. Unpaid commissions resulting from illegitimate software use (90%).
2. Consequential damages associated with illegitimate software use (10%).

(3) Do the parties agree to utilize a private mediator in lieu of the court's ADR Pilot Program?


Yes No

(4) If this case is in category civil rights - employment (442), check all boxes that describe the legal bases of plaintiff claim(s).

- Title VII
- 42 U.S.C. §1983
- Americans with Disabilities Act of 1990
- Other _____
- Age Discrimination
- California Fair Employment and Housing Act
- Rehabilitation Act

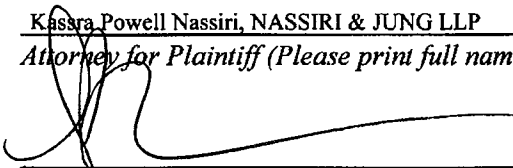
I hereby certify that all parties have discussed and agree that the above-mentioned responses are true and correct.

January 3, 2008
Date


Attorney for Plaintiff (Signature)

Kassandra Powell Nassiri, NASSIRI & JUNG LLP
Attorney for Plaintiff (Please print full name)

January 3, 2008
Date


Attorney for Defendant (Signature)

Ashlie Beringer, GIBSON DUNN & CRUTCHER LLP
Attorney for Defendant (Please print full name)