

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MIKE HARRIS and JEFF DUNSTAN,
individually and on behalf of a class of similarly
situated individuals

Plaintiff,

v.

COMSCORE, INC., a Delaware corporation

Defendant.

CASE NO. 1:11-cv-5807

Judge Holderman

Magistrate Judge Kim

DECLARATION OF MICHAEL BROWN

I, Michael Brown, hereby declare and state based upon my personal knowledge as follows:

1. I am the Chief Technology Officer ("CTO") at comScore, Inc. ("comScore") and have held that position since February 2011. Prior to being named CTO, I held various positions in the technology group since comScore's founding in 1999, and I was the chief architect of the comScore software.

2. My current office is located at comScore's offices in Reston, Virginia.

3. As part of my responsibilities, I am aware of the information regarding comScore panelists stored in comScore's databases. I am also aware of how to identify information regarding a particular panelist based on information gleaned from an inspection of his or her computer.

4. For example, by inspecting registry keys on a specific machine running a Windows-based operating system, comScore can search for the Machine Identifier assigned to the computer by the comScore software. By knowing the Machine Identifier, comScore could

identify information, attributed to that particular machine, that was collected by comScore's software and stored in comScore's databases. Thus, comScore would be able to verify the installation of the comScore software and would be able to determine the date of installation and the date at which the software ceased communicating with comScore servers. The Machine Identifier could be discerned through an inspection of the following registry keys and their children on a computer running a Windows-based operating system:

- HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows\CurrentVersion\Uninstall
- HKEY_LOCAL_MACHINE\SOFTWARE\Wow6432Node\Microsoft\Windows\CurrentVersion\Uninstall

5. Even if comScore is unable to determine the Machine Identifier, an inspection of a computer running a Windows-based operating system would allow comScore to determine whether its software had been installed on the subject computer by examining the following registry keys and their children:

- HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows NT\CurrentVersion\Winlogon\Notify
- HKEY_LOCAL_MACHINE\SOFTWARE\Wow6432Node\Microsoft\WindowsNT\CurrentVersion\Winlogon\Notify

6. Files contained in one of the following directories would also provide additional information regarding the download and use of comScore's software:

- C:\Program Files\RelevantKnowledge
- C:\Program Files\PremierOpinion
- C:\Program Files (x86)\RelevantKnowledge
- C:\Program Files (x86)\PremierOpinion

7. The existence of .osa files in the following locations would indicate that the computer user was a comScore panelist at one time:

- C:\Windows\Temp\
- C:\Documents and Settings\[USER]\Local Settings\Temp
- C:\Users\[USER]\AppData\Local\Temp

8. For computers that were still configured with the comScore software in or after November 2010, the computer's Media Access Control ("MAC") addresses could be used to determine whether the computer user was a comScore panelist and would enable comScore to create a link between the computer and data contained in comScore's database. To determine a computer's MAC addresses, the command "ipconfig /all" would need to be run on the actual computer, as the MAC address is physically stored on the computer hardware itself as opposed to being assigned by the operating system software.

9. Information regarding installation of a virus and/or antivirus software may also be stored in the registry files of a Windows-based operating system. Depending on the type of antivirus software, information may also be found on the computer detailing the programs that were detected and quarantined by the antivirus software.

10. For computers that have the comScore software installed and that run on a Macintosh operating system, the comScore Machine Identifier would be located in the following directory: /Applications/PremierOpinion. As with Windows-based operating systems, the Machine Identifier would allow comScore to verify the installation of the software, the date of installation, the date at which the software ceased communicating with comScore servers, and the information regarding the user collected by comScore's software and stored in comScore's databases.

11. Additionally, an inspection of a computer running a Macintosh-based operating system would allow comScore to determine whether its software had been installed on the subject computer by examining the following directories and subdirectories:


- /usr/libexec
- /System/Library/LaunchDaemons

12. The Trash folders and/or Recycle Bins contained on each computer may include a portion or all of any comScore software previously installed and deleted from the computer.

13. To the best of my knowledge, only an inspection of the subject computer would allow comScore to review and collect the registry keys and MAC addresses.

14. I hereby declare under the penalty of perjury that all statements made herein are true and correct.

Executed this 7th of May, 2012.



Michael Brown
Chief Technology Officer, comScore, Inc.