

EXHIBIT D

**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. There is no accurate way to determine how many panelists uninstalled comScore's software by a method other than the uninstall method provided as a part of the Microsoft Add/Remove Programs function.

4. comScore does not segregate incoming panelist communications between complaints and other types of communications, such as compliments or requests for technical assistance. In order to identify "complaints," each communication between comScore's personnel and panelists would need to be individually reviewed.

5. The document attached to comScore's Supplemental Interrogatory Responses as Exhibit A constitutes the official list of online activity information collected by comScore's software as maintained in the usual course of comScore's business. comScore does not maintain any additional lists of online activity data collected by comScore software. In particular, comScore does not maintain a separate list of online activity data collected by comScore's "beta" Macintosh software. comScore never commercially implemented any Macintosh-based software.

6. The "Legacy" fields included on Exhibit A to comScore's Supplemental Interrogatory Responses represent pieces of data that comScore has determined to no longer collect. When comScore, for any reason, decides to no longer collect a certain piece of online activity information from its panelists but wishes to maintain the placeholder for compatibility purposes, it zeros out the value of the information and changes the description of the information in the list of information collected to "Legacy field."

7. comScore does not maintain a list of the information previously collected that has since been transitioned to a "Legacy field."

8. In order to attempt to determine what information was previously collected under the "Legacy field" values for each individual release of our software, comScore employees would be required to search through old source code and related documentation in an attempt to find previous descriptions of the Legacy field. However, such a search would be time-consuming, is not likely to result in an exhaustive list of previous Legacy field values, and is not likely to be completely accurate. The results of such a search would be of limited value, as they would reflect comScore's best guess regarding the previous descriptions of Legacy field values.

9. comScore does not, in the ordinary course of business, create screenshots of all dialog boxes used by all of comScore's third party partners.

10. It is my understanding that comScore, on or about October 2011, took and saved screenshots of the comScore disclosure from each active third-party U.S. vendor. Each and every one of these screenshots were included as part of Exhibit A to comScore's Supplemental Interrogatory Responses.

11. None of the documents collected and produced by comScore in response to Plaintiffs' Discovery Requests were collected from a storage location. All collected documents were housed on comScore's active company systems.

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

Executed this 18th day of May, 2012.



Michael Brown
Chief Technology Officer
comScore, Inc.