

# EXHIBIT F

## Robyn Bowland

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**From:** Robyn Bowland  
**Sent:** Friday, April 27, 2012 6:01 PM  
**To:** 'rbalabanian@edelson.com'; 'jedelson@kamberedelson.com'; 'ascharg@edelson.com'; 'cgivens@edelson.com'  
**Cc:** Andy Schapiro; Stephen Swedlow; Amanda Williamson; 'Paul Stack'; 'Mark Wallin'  
**Subject:** Dunstan et al. v. comScore, Case No. 1:11-cv-5807

Counsel,

Below are comScore's responses to the issues you raised on April 24, 2012 regarding comScore's supplemental discovery responses.

### **Interrogatory No. 13**

Plaintiffs requested additional information regarding the screenshots attached as Exhibit A to comScore's First Supplemental Interrogatory Responses. The screenshots attached as Exhibit A were collected by comScore in approximately October 2011. Copies of screenshots used by comScore's third party partners are not kept by comScore in the ordinary course of business. Thus, screenshots of every dialog box used by comScore's third party partners during the relevant time period are not in comScore's custody and control.

### **Interrogatory No. 16**

Plaintiffs requested additional information regarding the "Legacy fields" listed on the document attached as Exhibit B to comScore's First Supplemental Interrogatory Responses. Legacy fields are fields that represent data that used to be collected, but is no longer collected. Instead of deleting these fields, comScore zeroes out the fields. However, comScore does not maintain a list of the data that used to be collected in these Legacy fields, and therefore cannot readily provide such a list. Additionally, comScore does not maintain documentation regarding when these Legacy fields were zeroed out.

### **Interrogatory No. 17**

Plaintiffs requested additional information regarding "each type of information that YOUR MACINTOSH SOFTWARE monitors, collects, retains, or transmits about MAC PANELISTS." First, comScore does not agree with Plaintiffs' assertion that comScore's supplemental response is non-responsive. As pointed out in the response, comScore does not collect any information about Mac panelists. However, to the extent Plaintiffs are seeking information regarding the information comScore's prototype Macintosh software was designed to collect, the Macintosh software was designed to collect the same data collected by comScore's PC-based software. comScore does not and has never maintained a separate list of data that was collected by the Macintosh software.

Regards,

**Robyn M. Bowland**

Associate

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