

EXHIBIT D

Robyn Bowland

From: Stephen Swedlow
Sent: Friday, May 18, 2012 2:22 PM
To: Chandler Givens; Robyn Bowland
Cc: ascharg@edelson.com; jedelson@kamberedelson.com; rbalabarian@edelson.com; Andy Schapiro; Amanda Williamson; Paul Stack; Mark Wallin
Subject: RE: Letter re: comScore's Motion to Compel and Inadvertent Disclosure

Chandler:

Thanks for your letter. Please do send the files and information you offer to send in your letter. We will need an opportunity to review that information. After we review that information, it may be that examination of the computer and hard drive in question is unnecessary with one exception. With respect to the antivirus logs produced by Plaintiffs as Harris-Dunstan 0615-0630, Plaintiffs' production is still insufficient. Plaintiffs appear to have provided only the antivirus logs regarding "threats" that purport to be software related to comScore (as evidenced by the redactions on the documents). However, given comScore's concerns that Plaintiff Dunstan's computer may have been compromised by an actual computer virus, comScore needs the entirety of the antivirus logs. If you will agree to produce this additional information, we will withdraw our motion to compel without prejudice. Finally, comScore would need to reserve its right renew this motion to compel after its review of the files and information you have agreed to produce if that information is insufficient to satisfy comScore's discovery needs.

Stephen Swedlow
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From: Chandler Givens [mailto:cgivens@edelson.com]
Sent: Wednesday, May 16, 2012 7:08 PM
To: Robyn Bowland
Cc: ascharg@edelson.com; jedelson@kamberedelson.com; rbalabarian@edelson.com; Andy Schapiro; Stephen Swedlow; Amanda Williamson; Paul Stack; Mark Wallin
Subject: Letter re: comScore's Motion to Compel and Inadvertent Disclosure

Counsel:

Please see the attached correspondence.

Regards,

Chandler

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