EXHIBIT N

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

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MIKE HARRIS and JEFF DUNSTAN, x
individually and on behalf of :
a class of similarly situated :
individuals, :
:
                Plaintiffs, : Case No. 1:11-5807
    vs. : Hon. James F. Holderman
:
COMSCORE, INC., a Delaware :
corporation, :
:
                Defendant. x

_____

                    Thursday, September 13, 2012

                    Reston, Virginia

DEPOSITION OF:

        MICHIKO AVANTIKA CHAND,

a witness, called for oral examination by counsel for

plaintiffs in the above-captioned matter, pursuant to

Notice and agreement of the parties as to time and date,

held at the offices of comScore, Inc., 11950 Democracy

Drive, Suite 600, Reston, Virginia 20191, beginning at

approximately 9:30 o'clock, a.m., before Patricia Klepp,

RMR, a court reporter and Notary Public in and for the

Commonwealth of Virginia, when were present on behalf of

the respective parties:

1   Q.   The discussion we've just had about the

2   collection of HTTP HTML page data, do the same rules

3   apply if it's HTTPS HTML page data?

4   MS. BOWLAND: Objection; vague.

5   BY MR. GIVENS:

6   Q.   You just described the process of how

7   personally identifiable information is fuzzified and

8   then sent to comScore servers in situations when a user

9   is on an HTTP HTML website. Do those rules apply

10 equally if the user is on a secure site, HTTPS?

11   A.   Do you mean the rules of fuzzification?

12   Q.   Yes.

13   A.   Yes.

14   Q.   Okay. Let's talk about the process for

15 capturing HTTP HTML post data.

16   How does OSSProxy want HTTP HTML post data to

17 collect?

18   MS. BOWLAND: Objection.

19   A.   Yes, a little more detail.

20 BY MR. GIVENS:

21   Q.   What HTTP HTML post data does OSSProxy

22 collect?

 1   A.   If it's typed text HTML, it will collect it.

 2   Q.   It will collect all post data?

 3   A.   Yes.

 4   Q.   Does it fuzzify all post data?

 5   A.   Yes.

 6   Q.   Is there any post data that's not fuzzified?

 7   A.   All post data goes through a fuzzification

 8   route.

 9   Q.   That didn't answer my question.

10   So is all post data fuzzified?

11   A.   Yes.

12   Q.   All right.

13   MR. GIVENS: Let's take a quick five-minute

14   break.

15   (Whereupon, a recess was taken.)

16   MR. GIVENS: Back on.

17   BY MR. GIVENS:

18   Q.   Okay. Before we took a break, we were

19   discussing fuzzification of post data, and you said that

20   all post data is fuzzified.

21   A.   Yes.

22   Q.   Are there -- there's no instances when post

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 1   BY MR. GIVENS:

 2   Q.   What's an example of a discernible field name?

 3   A.   Name.

 4   Q.   And so can you think of an example of a

 5   non-discernible field name?

 6   A.   XYZ.

 7   Q.   Am I accurately describing the problem as when

 8   the software sees the field name as XYZ, it doesn't

 9   understand that it needs to fuzzify that information?

10   MS. BOWLAND: Objection; vague.

11   A.   Yes.

12   BY MR. GIVENS:

13   Q.   This ticket was created in February, 2009; the

14   top right of the first page lists its creation date.

15   MS. BOWLAND: Sorry; is that a question?

16   MR. GIVENS: It's coming.

17   BY MR. GIVENS:

18   Q.   The very last comment is on May of 2009, and

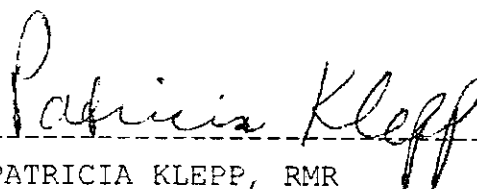19   it appears that that's when the issue was fixed.

20   Does that seem correct to you?

21   MS. BOWLAND: Objection; mischaracterization.

22   Also vague.

CERTIFICATE OF NOTARY PUBLIC

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2   I, Patricia Klepp, RMR, the officer before

3 whom the foregoing deposition was taken, do hereby

4 certify that the witness whose testimony appears herein

5 was duly sworn by me; that the testimony of said witness

6 was taken by me in shorthand and this transcript typed

7 under my direction; that said transcript is a true

8 record of the testimony given by said witness; that I am

9 neither counsel for, related to, nor employed by any of

10 the parties to the action in which this deposition was

11 taken; and, further, that I am not a relative or

12 employee of any attorney or counsel retained by the

13 parties hereto, nor financially or otherwise interested

14 in the outcome of the action.

15

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17 _____

PATRICIA KLEPP, RMR

18 Notary Public in and for the

Commonwealth of Virginia

19 Registration No. 119760

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My commission expires:

22 November 30, 2012