

EXHIBIT R

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) No. 1:11-cv-5807
similarly situated)
individuals,)
Plaintiffs,)
vs.)
COMSCORE, INC., a)
Delaware corporation,)
Defendant.)

THE VIDEOTAPED DEPOSITION OF JEFFREY DUNSTAN

August 8, 2012

Chicago, Illinois

9:37 a.m.

REPORTED BY:
SHERI E. LISS
JOB NO: 26487

DEPOSITION OF JEFFREY DUNSTAN

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2 The videotaped deposition of JEFFREY
3 DUNSTAN, called by the Defendant for examination,
4 taken pursuant to the Code of Civil Procedure and
5 the Rules of the Supreme Court of the State of
6 Illinois pertaining to the taking of depositions for
7 the purposes of evidence, taken before Sheri E.
8 Liss, CSR NO. 084-002600, a Certified Shorthand
9 Reporter within and for the State of Illinois,
10 Registered Professional Reporter, Certified Realtime
11 Reporter, at the offices of Quinn Emanuel Urquhart &
12 Sullivan, LLP, 500 West Madison Street, Suite 2450,
13 Chicago, Illinois, on August 8, 2012 at the hour
14 9:37 o'clock a.m.
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DEPOSITION OF JEFFREY DUNSTAN

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2 that has been along these rounds, so I probably have
3 seen it.

4 Q. If you look at the first page, about
5 three lines from the bottom it says, "He downloaded
6 and installed photo cropping software that
7 unbeknownst to him was bundled with Comscore
8 software."

9 Do you see that?

10 A. Yes.

11 Q. You don't actually know one way or the
12 other whether you downloaded and installed the photo
13 cropping software or whether your wife downloaded
14 it; is that correct?

15 A. That's a hard one. Because when this
16 came up, I told her not to use the computer until I
17 got it straightened out. So I do not believe she
18 could have been the one that downloaded it.

19 Q. This came up after you realized that you
20 had this program on your computer?

21 A. I had a problem. I may not have gotten
22 to the point I knew which program it was yet.

23 Q. But you don't recall one way or another
24 whether you downloaded the photo cropping software,
25 correct?

DEPOSITION OF JEFFREY DUNSTAN

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A. No, I really don't specifically.

Q. When you first discovered the problem, had you ever heard of Relevant Knowledge?

A. No.

(Whereupon, Dunstan Exhibit 7 marked as requested.)

(Whereupon, the document was tendered.)

BY MR. SWEDLOW:

Q. I'm handing you what's marked as Exhibit 7.

Have you ever seen that before?

A. Yes.

Q. What is this?

A. This is the log taken off my computer from what Spy Doctor removed from my computer that relates to Relevant Knowledge.

Q. Did you make this?

A. Yes.

Q. How did you make this?

A. I looked up the log. I located the logs for Spy Doctor on my computer where it stores its logs, looked at it and then printed out the section that included entries relating to Relevant

DEPOSITION OF JEFFREY DUNSTAN

STATE OF ILLINOIS)

) SS:

COUNTY OF C O O K)

I, SHERI E. LISS, CSR NO. 084-002600, a Certified Shorthand Reporter within and for the State of Illinois, Registered Professional Reporter, Certified Realtime Reporter, do hereby certify that previous to the commencement of the examination, said witness was duly sworn by me to testify; that the said deposition was taken at the time and place aforesaid; that the testimony given by said witness was reduced to writing by means of shorthand and thereafter transcribed into typewritten form; and that the foregoing is a true, correct and complete transcript of my shorthand notes so taken as aforesaid.

I further certify that there were present at the taking of the said deposition the persons and parties as indicated on the appearance page made a part of this deposition.

DEPOSITION OF JEFFREY DUNSTAN

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2 I further certify that I am not counsel
3 for nor in any way related to any of the parties to
4 this suit, nor am I in any way interested in the
5 outcome thereof.

6 I further certify that this certificate
7 applies to the original signed and certified
8 transcripts only. I assume no responsibility for
9 the accuracy of any reproduced copies not made under
10 my control or direction.

11 IN TESTIMONY WHEREOF I have hereunto set
12 my hand this 15th day of August, A.D., 2012.

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16 Sheri E. Liss, CSR, RPR, CRR, CLR
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