EXHIBIT N

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,	:	
Plaintiffs,	:	Case No. 1:11-5807
vs.	:	Hon. James F. Holderman
COMSCORE, INC., a Delaware corporation,	:	
Defendant.	:	

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:

APPEARANCE OF COUNSEL:

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APPEARANCE OF COUNSEL: (cont)

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P R O C E E D I N G S

Thereupon,

MICHIKO AVANTIKA CHAND,

a witness, was called for examination by counsel for the plaintiffs, and after having first been duly sworn by the Notary Public, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFFS

BY MR.GIVENS:

Q. Good morning.

A. Good morning.

Q. Is this your first time sitting for a deposition, Michiko?

A. Yes.

Q. Fine. Well, just a couple of quick ground rules. This is just a conversation, but unlike most conversations, Patricia is going to be typing everything we say, so everything that you respond to my questions has to be verbal. So you can't shrug your shoulders, or nod your head, or stick out your tongue at me, because that won't get picked up. So if you can, please try to remember to do that. If not, I'll try to remind you.

I'm going to presume you understand all my questions. If not, just ask me to verify, and I'm happy to do that anytime.

If you ever want to take a break, get a glass of water, go to the restroom, just let me know, that's fine; I only ask that if I have a question pending, that you answer the question that's pending first, and then we'll take break.

Is there any reason why this morning you can't give full, truthful testimony? Are you on any medications?

A. No.

Q. Okay. So just to start with, can you tell me what your role is, here at comScore?

A. I am a quality assurance manager.

Q. How long have you been the QA manager?

A. Since April this year.

Q. April of this year?

A. Yes.

Q. And what is your job description?

A. I work on the Windows meter, CPROXY, and I also oversee the automation of some of the testing that

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A. Yes.
Q. Can you explain to me in general, if a user is browsing the internet, how that information is collected?
A. It's collected in XML format, and it depends on what the user is doing on the internet.
Q. Can you elaborate?
A. If he visits a page, like CNN.com, we log that he visited CNN.com.
Q. You log the URL?
A. Yes.
Q. And that information is sent to comScore servers?
A. Yes.
Q. How is it sent to comScore servers?
A. It's posted by OSSProxy.
Q. XML post?
A. Yes.
Q. Does that happen in realtime?
A. Yes.
Q. How about page data; how is that collected?
A. It's collected for some pages.

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Q. How do you determine which pages information is collected from?
A. It's based on key words, and if it's a secure page, then we collect the page data.
Q. What if it's not secure?
A. Only if there is a key word match would we collect the page.
Q. How do you determine the key words?
A. It comes from requirements.
Q. If OSSProxy detects a predefined key word, what information is then collected?
A. The page data.
Q. All of the page data?
A. Yes.
Q. What if it's a different MIME type? What if it's ASP or CSS? There's a question coming.
(Whereupon, a discussion was held off the record.)
BY MR. GIVENS:
Q. Do the same rules apply? Key words are detected, and then information is collected?
A. If there is a key word for that specific MIME type, it will be collected.

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Q. Thank you. When that key word is detected and the information is collected, the page data, is certain personally identifiable information fuzzified before it's sent to comScore servers?
A. Yes.
Q. How do you parse through the page data to figure out what's personally identifiable information?
MS. BOWLAND: Objection.
A. It's done in the code somewhere; I'm not sure how.
BY MR. GIVENS:
Q. You didn't develop the code?
A. No.
Q. If I said that comScore uses regular expressions to find those strings, does that sound right?
A. Yes.
Q. Do you know of any instances where comScore has known that personally identifiable information was not being fuzzified and being sent to comScore servers?
A. Yes.

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Q. Do you know of any instances where comScore has known that personally identifiable information is being collected and not fuzzified, and it's continuing to let that happen?
A. No.
Q. Are you familiar with the Mystery Shopper program?
A. Not much.
Q. What are comScore's procedures for determining whether or not personally identifiable information is correctly being fuzzified?
A. Like ...
MS. BOWLAND: Objection; vague.
A. Yes, a little more details, please.
BY MR. GIVENS:
Q. You don't make the objections; just to be clear.
Within comScore, how do employees determine whether or not personally identifiable information is being correctly fuzzified that's collected from HTTP HTML page data?
A. From a QA perspective?

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Q. Yes.
A. We do tests every time a build is put out.
Q. What do those tests entail?
A. We visit secure sites, we make what the user would do and then check that the data is being fuzzified.
Q. And if it's not being fuzzified, then what do you do?
A. We take steps to correct it.
Q. What steps do you take to correct it?
A. We check if it's a code change that's needed, or is it a rule change, and then we accordingly take the steps to correct it.
Q. In what scenarios would a rule change be needed?
A. If something on the site changed significantly, and then we -- sometime it's a rule change.
Q. In what situations would a code change be needed?
A. If it's a new MIME type or something which is new to Proxy.

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Q. If a code change is needed to fuzzify personally identifiable information, how long would it take to implement that change?
MS. BOWLAND: Objection; vague.
THE WITNESS: Yes.
BY MR. GIVENS:
Q. You've determined that personally identifiable information is not being correctly fuzzified, but it requires a code change to fix.
How long would it take to implement that code change?
A. It depends on the extent of the code change.
Q. On average, how long would it take?
A. I cannot -- I mean, cannot say it like that; it really depends on the extent of the code change.
Q. Could it be changed in a day?
A. No.
Q. Could it be changed in a week?
A. Yes.
Q. Could it be changed and then deployed to panelists in a week?
A. Yes.

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Q. The discussion we've just had about the collection of HTTP HTML page data, do the same rules apply if it's HTTPS HTML page data?
MS. BOWLAND: Objection; vague.
BY MR. GIVENS:
Q. You just described the process of how personally identifiable information is fuzzified and then sent to comScore servers in situations when a user is on an HTTP HTML website. Do those rules apply equally if the user is on a secure site, HTTPS?
A. Do you mean the rules of fuzzification?
Q. Yes.
A. Yes.
Q. Okay. Let's talk about the process for capturing HTTP HTML post data.
How does OSSProxy want HTTP HTML post data to collect?
MS. BOWLAND: Objection.
A. Yes, a little more detail.
BY MR. GIVENS:
Q. What HTTP HTML post data does OSSProxy collect?

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A. If it's typed text HTML, it will collect it.
Q. It will collect all post data?
A. Yes.
Q. Does it fuzzify all post data?
A. Yes.
Q. Is there any post data that's not fuzzified?
A. All post data goes through a fuzzification route.
Q. That didn't answer my question.
So is all post data fuzzified?
A. Yes.
Q. All right.
MR. GIVENS: Let's take a quick five-minute break.
(Whereupon, a recess was taken.)
MR. GIVENS: Back on.
BY MR. GIVENS:
Q. Okay. Before we took a break, we were discussing fuzzification of post data, and you said that all post data is fuzzified.
A. Yes.
Q. Are there -- there's no instances when post