

EXHIBIT O

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

MIKE HARRIS and JEFF DUNSTAN,)	
individually and on behalf of a class of)	
similarly situated individuals,)	Case No. 1:11-cv-5807
)	
Plaintiffs,)	[Hon. James F. Holderman]
v.)	
)	[Magistrate Judge Young B. Kim]
COMSCORE, INC., a Delaware)	
corporation,)	
)	
Defendant.)	
_____)	

**PLAINTIFF MIKE HARRIS’S RESPONSES TO
DEFENDANT COMSCORE, INC.’S FIRST SET OF INTERROGATORIES**

Plaintiff Mike Harris (“Harris” or “Plaintiff”) provides the following answers to Defendant comScore, Inc.’s (“comScore” or “Defendant”) First Set of Interrogatories:

Answers to Interrogatories

1. Identify every Communication and Document You viewed or relied upon in downloading third-party software you allege was bundled with comScore Software, including all websites, webpages, advertisements, or solicitations.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is overly broad (it requires Plaintiff to identify potentially dozens of individual webpages that he viewed while browsing the World Wide Web (“WWW”) for screensaver software approximately two (2) years ago), unduly burdensome (it seeks information that was ephemerally stored on his computer approximately two (2) years ago) and seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence (the individual webpages viewed by Plaintiff in search of screensaver software are not relevant to the class certification analysis). Plaintiff further objects to this Interrogatory on the basis that the information sought is within Defendant’s possession, custody or control, and is easily discoverable from Defendant’s own

during the download and installation process, nor does Plaintiff recall agreeing to the download of comScore software, or any other software (aside from the free screensaver).

* * * * *

6. Describe all Facts Related To Your efforts to remove comScore Software from Your computer, including but not limited to describing the amount of time You contend the comScore software was installed on Your computer.

ANSWER: Plaintiff states that, to the best of his knowledge, in or around March of 2010, Plaintiff downloaded and installed a free screensaver that, unbeknownst to him, was bundled with comScore’s software. Some time after the free screensaver was installed, Plaintiff noticed that the menu extras on his menu bar had shifted locations. Upon inspection, Plaintiff realized that a new, transparent menu extra was added to his menu bar. Plaintiff states that he could not have noticed this new menu extra if its presence had not shifted the placement of adjacent menu items. After discovering the menu extra, Plaintiff conducted research on the WWW to determine what the item was. Plaintiff’s research revealed that the menu extra indicated that PremierOpinion—comScore’s software—was operating on his computer. Plaintiff then spent several hours attempting to remove PremierOpinion manually because he was concerned that the software’s uninstaller would not fully remove the software (due to the fact it had been installed on his computer without his knowledge). Unable to manually remove the software, Plaintiff ultimately used the PremierOpinion uninstaller. In sum, Plaintiff spent two (2) – three (3) hours attempting to remove comScore’s software.

* * * * *

7. If You contend that comScore sold personal information collected by comScore Software from Your computer, Describe all Facts related to that contention.

ANSWER: Plaintiff objects to this Interrogatory to the extent it seeks disclosure of information protected by the attorney client privilege and the attorney work product doctrine.

Subject to and without waiving this objection, Plaintiff states that he seeks (i) statutory damages pursuant to Defendant's violations of 18 U.S.C. § 2707(c) and 18 U.S.C. § 2520, (ii) an award of punitive damages where applicable, and (iii) reasonable attorneys' fees and other litigation costs reasonably incurred. Plaintiff's investigation continues and he reserves the right to supplement his answer to this Interrogatory as appropriate.

As to Objections:

Dated: April 9, 2012

MIKE HARRIS, individually, and on behalf of all others similarly situated,

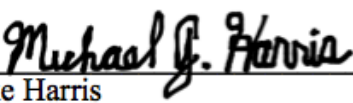
By: /s/ Chandler R. Givens
One of Their Attorneys

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DECLARATION

I, Mike Harris, declare under penalty of perjury that the foregoing *Plaintiff Mike Harris's Responses to Defendant comScore, Inc.'s First Set of Interrogatories* is true and correct.

Executed on April 8, 2012 at Chicago, Illinois.



Mike Harris