

EXHIBIT S

**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 JEFF DUNSTAN’S RESPONSES TO
DEFENDANT COMSCORE, INC.’S FIRST SET OF INTERROGATORIES**

Plaintiff Jeff Dunstan (“Dunstan” 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 photo-cropping software¹ in September 2010), unduly burdensome (it seeks information that was ephemerally stored on his computer in September 2010) 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 photo-cropping software are not relevant to the class certification analysis). Plaintiff further

¹ Plaintiff initially believed that comScore’s software was bundled with free greeting card template software that he downloaded. After further investigation, it appears that comScore’s software was bundled with photo-cropping software.

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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 September of 2010, he downloaded and installed photo-cropping software that, unbeknownst to him, was bundled with comScore’s software. Almost immediately after the download, Plaintiff’s computer began malfunctioning. In particular, access to the WWW became intermittent and his computer started locking up in such a way that he could no longer operate it in any meaningful manner. After restarting the computer into Safe Mode, Plaintiff navigated to the Control Panel, opened the Add or Remove Programs tool and noticed that ‘RelevantKnowledge’ software had been installed on his computer. At the same time, Plaintiff’s firewall detected the re-routing of his Internet traffic to comScore’s servers. After much struggle, Plaintiff was eventually able to browse the WWW to perform a search for a product to remove RelevantKnowledge. Plaintiff discovered a software product—PC Tools Spyware Doctor—which was marketed as a tool capable of removing RelevantKnowledge. After purchasing, installing, and running PC Tools Spyware Doctor, the software detected and removed RelevantKnowledge. Once PC Tools Spyware Doctor removed RelevantKnowledge, Plaintiff’s computer returned to normal functionality. In sum, Plaintiff spent approximately ten (10) hours fixing the damage caused to his computer by 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 suffered actual damages in the form of monies paid to purchase the software that was required to detect and remove comScore's software from his computer. Plaintiff further states that he seeks (i) statutory damages pursuant to Defendant's violation 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.

As to Objections:

Dated: April 9, 2012

JEFF DUNSTAN, individually, and on behalf of
all others similarly situated,

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

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DECLARATION

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

Executed on April 6, 2012 at Bakersfield, California.

Jeff Dunstan  _____
