# **EXHIBIT I**

### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

MIKE HARRIS and JEFF DUNSTAN, individually and on behalf of a class of similarly situated individuals,  Plaintiffs,	) ) ) ) Case No. 1:11-cv-5807 SI )
v.	)
COMSCORE, INC., a Delaware corporation,  Defendant.	) ) ) )

## <u>DEFENDANT COMSCORE, INC.'S RESPONSES</u> TO PLAINTIFF HARRIS' FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Memorandum and Opinion Order granting bifurcation of discovery entered March 2, 2012 ("Bifurcation Order"), Defendant comScore, Inc, ("comScore"), by its undersigned attorneys, hereby object and respond to Plaintiff Mike Harris' ("Harris") First Set of Interrogatories ("Interrogatories").

#### **General Objections**

The following general objections apply to each and every Interrogatory propounded by Harris and are incorporated into each of the following responses by reference as if fully set forth therein.

#### **INTERROGATORY NO. 16:**

IDENTIFY and DESCRIBE each type of information that YOUR WINDOWS SOFTWARE monitors, collects, retains, and/or transmits from PC PANELISTS.

#### **RESPONSE TO INTERROGATORY NO. 16**

comScore incorporates each of its general objections by reference. comScore further objects to this request on the grounds that it is vague and ambiguous, overly broad, unduly burdensome, harassing and oppressive; seeks confidential and proprietary information, and it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, comScore replies:

See documents produced in Response to Interrogatory No. 1.

#### **INTERROGATORY NO. 17:**

IDENTIFY and DESCRIBE each type of information that YOUR MACINTOSH SOFTWARE monitors, collects, retains, or transmits about MAC PANELISTS.

#### **RESPONSE TO INTERROGATORY NO. 17**

comScore incorporates each of its general objections by reference. comScore further objects to this request on the grounds that it is vague and ambiguous, overly broad, unduly burdensome, harassing and oppressive; and it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, comScore replies:

None. comScore terminated its attempts to create a commercial version of Mac-based comScore software on or about September 25, 2010. To the best of comScore's knowledge, none of the data collected by the beta version of the comScore software was ever shared with, or

sold to, a third party.

See also comScore's Response to Interrogatory No. 16.

#### **INTERROGATORY NO. 18:**

IDENTIFY and DESCRIBE YOUR relationship with Trees for the Future, NPO and IDENTIFY the total number of trees that have been planted as a result of such relationship.

#### **RESPONSE TO INTERROGATORY NO. 18**

comScore's obligation to respond to Interrogatory No. 18 is stayed pursuant to Magistrate Judge Kim's Bifurcation Order issued March 2, 2012.

#### **INTERROGATORY NO. 19:**

DESCRIBE YOUR investigation of the MAC PANEL, INCLUDING the reasons for its ultimate termination, and IDENTIFY ALL DOCUMENTS RELATING TO such investigation.

#### **RESPONSE TO INTERROGATORY NO. 19**

comScore's obligation to respond to Interrogatory No. 19 is stayed pursuant to Magistrate Judge Kim's Bifurcation Order issued March 2, 2012.

#### **INTERROGATORY NO. 20:**

IDENTIFY each PERSON involved in drafting YOUR public response to this lawsuit, which is accessible at the following URL:

http://www.comscore.com/About\_comScore/Methodology/Privacy/comScore\_Response\_to\_Ede lson\_McGuire\_Lawsuit.

#### **RESPONSE TO INTERROGATORY NO. 20**

comScore's obligation to respond to Interrogatory No. 20 is stayed pursuant to Magistrate Judge Kim's Bifurcation Order issued March 2, 2012.

burdensome, harassing and oppressive; it seeks information that is not relevant or reasonably

calculated to lead to the discovery of admissible evidence; and it seeks to circumvent the parties'

agreement regarding disclosure of expert witnesses and expert witness reports as memorialized

in the Form 52 entered in this case.

Subject to and without waiving the foregoing general and specific objections, comScore

states that comScore will disclose any expert witnesses, and said witnesses' opinions and

qualifications, in accordance with the parties' agreement as memorialized on the Form 52 entered

in this case.

DATED: March 23, 2012

By /s/ Robyn M. Bowland

Andrew Schapiro

Email: andrewschapiro@quinnemanuel.com

Stephen Swedlow

Email: stephenswedlow@quinnemanuel.com

Amanda Williamson

amandawilliamson@quinnemanuel.com

Robyn Bowland

robynbowland@quinnemanuel.com

**QUINN EMANUEL URQUHART &** 

SULLIVAN, LLP

500 West Madison Street, Suite 2450

Chicago, Illinois 60661

Telephone: (312) 705-7400

Facsimile: (312) 705-7499

Paul F. Stack pstack@stacklaw.com Mark William Wallin mwallin@stacklaw.com Stack & O'Connor Chartered 140 South Dearborn Street Suite 411

Chicago, IL 60603

Telephone: (312) 782-0690 Facsimile: (312) 782-0936

Attorneys for Defendant comScore, Inc.