

EXHIBIT C

**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

Plaintiff,

v.

COMSCORE, INC., a Delaware corporation

Defendant.

CASE NO. 1:11-cv-5807

Judge Holderman

Magistrate Judge Kim

DECLARATION OF MICHAEL BROWN

I, Michael Brown, hereby declare and state based upon my personal knowledge as follows:

1. I am the Chief Technology Officer ("CTO") at comScore, Inc. ("comScore") and have held that position since February 2011. Prior to being named CTO, I held various positions in the technology group since comScore's founding in 1999, and I was the chief architect of the comScore software.

2. My current office is located at comScore's offices in Reston, Virginia.

3. "Pushing" a notice to all current comScore panelists via comScore's software would require the investment of significant financial, developmental and administrative resources by comScore.

4. Producing a computer-readable file containing the names, mailing addresses, and email addresses of Class members found in comScore's database would also require the investment of significant financial, developmental and administrative resources.

5. comScore has never before attempted to program or push a notice to all panelists who downloaded comScore's software via bundling partner.

6. Producing a file containing the names, mailing addresses, and email addresses of all Class members would require comScore to search through literally millions of records to determine which panelists meet the criteria set forth by the Court in its class definition, and then to identify from this group the roughly three percent for which comScore still has contact information.

7. As I understand the current class definition—all panelists since 2005 who downloaded comScore's software via a third party bundler—the class encompasses the download of comScore onto approximately ten million machines.

8. Repeated messaging can negatively affect a panelist's experience, making it harder for comScore to retain panelists.

9. I hereby declare under the penalty of perjury that all statements made herein are true and correct.

Executed this 22nd of April, 2013.



Michael Brown
Chief Technology Officer, comScore, Inc.