

EXHIBIT A

Edelson McGuire, LLC

350 North LaSalle, Suite 1300, Chicago, IL 60654
t 312.589.6370 f 312.589.6378

www.edelson.com

September 29, 2011

VIA EMAIL AND FIRST CLASS MAIL

Michael Rhodes
Cooley LLP
101 California Street, 5th Floor
San Francisco, California 94111
rhodesmg@cooley.com

Re: *Dunstan, et al. v. comScore, Inc., Case No. 1:11-cv-5807*

Dear Michael:


We have reviewed comScore, Inc.'s ("comScore") Response in Opposition to Plaintiffs' Motion for Leave to Conduct Expedited Discovery, and are sensitive to its concerns about disclosing its clients' identities. As explained in our Motion, we are only seeking the identities of comScore's clients so that we may issue subpoenas directing them to preserve any discoverable evidence in their possession. In our view, and as suggested in the Motion, these concerns would be alleviated if the Parties entered into a mutually agreeable confidentiality and protective order before comScore discloses the requested information.

However, if the suggested confidentiality and protective orders do not satiate your concerns, we are open to exploring alternative ways to handle this third party preservation issue. For example, we would agree to withdraw Proposed Interrogatory Nos. 1 and 2 from the Motion if comScore agrees to: (i) inform its current, former, and future clients via written communication (language negotiable) that a lawsuit has been filed and that they possess potentially discoverable information, and (ii) accept sole responsibility for any spoliation issues that arise from its clients' failure to preserve such information.

Of course, we would strongly consider any alternative suggestions that you may have with respect to third party evidence preservation. Please let us know if you have any such suggestions. We look forward to hearing from you before the hearing on Tuesday.

Best regards,

EDELSON MCGUIRE LLC



Ari J. Scharg

cc: Jay Edelson