Exhibit A

MIKE HARRIS and JEFF DUNSTAN,
individually and on behalf of a class of
similarly situated individuals,

          Plaintiffs,

          v.

COMSCORE, INC., a Delaware corporation,

          Defendant.

Case No. 1:11-cv-5807

Hon. James F. Holderman

Magistrate Judge Young B. Kim

[PROPOSED] PROTECTIVE ORDER GOVERNING PRODUCTION OF PLAINTIFF JEFF DUNSTAN'S HARD DRIVE

In accordance with this Court's October 16, 2013 Order, (Dkt. 235), it is hereby Ordered that:

1. Defendant comScore, Inc. ("comScore") shall designate an expert ("comScore's Expert") pursuant to the Protective Order entered in this matter, (Dkt. 72), and submit his/her name and address to the Court by October 22, 2013. For purposes of this Protective Order, comScore's Expert shall be _____.

2. Either one (1) day after the entry of this Order or on October 25, 2013, whichever is later, Plaintiff Dunstan shall provide a full image (the "Image") of his hard drive, as preserved by Plaintiffs' forensic experts, to comScore's Expert.

3. Within seven (7) days after delivery of the Image, comScore shall identify for Plaintiffs and comScore's Expert the specific information sought from the Image ("comScore's Requests").

4. comScore's Expert shall search the Image for the information identified in comScore's Requests and transfer responsive data to a separate hard disk (the "Retrieved Data").

Neither comScore nor its counsel shall be permitted access to the Image, nor be present during its examination. comScore's Expert shall not disclose the results of his/her examination of the Image to comScore without first discussing those results with Plaintiffs' counsel.

5.   comScore's Expert will provide the Retrieved Data to Plaintiffs' counsel who, within five (5) business days following receipt of the Retrieved Data, may object in good faith to the production of information retrieved from the Image on any grounds provided for under the Federal Rules of Civil Procedure. Plaintiffs shall be allowed to remove any materials subject to the attorney-client privilege or work-product doctrine from the Retrieved Data and add such materials to a privilege log. Plaintiffs' counsel shall produce all uncontested information from the Retrieved Data to comScore's counsel within seven (7) days after receiving the Retrieved Data.

6.   If comScore wishes to contest any of Plaintiffs' objections to the production of information from the Retrieved Data, contest Plaintiffs' claims of privilege, or if any other disputes arise concerning the Retrieved Data, the Parties will first meet and confer to resolve such disputes and will subsequently submit the matter to the Court if resolution is not achieved.

IT IS SO ORDERED.

Dated this ___day of _____ 2013.   _____
                                            HONORABLE YOUNG B. KIM
                                            UNITED STATES MAGISTRATE JUDGE