

**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

**COMSCORE'S DESIGNATION OF FORENSIC EXPERT AND SUBMISSION OF
PROPOSED REVISIONS TO PLAINTIFFS' PROPOSED PROTECTIVE ORDER
GOVERNING PRODUCTION OF PLAINTIFF DUNSTAN'S HARD DRIVE**

Pursuant to this Court's October 16, 2013 Order (Dkt. No. 235), comScore hereby designates Mike Perry of Elysium Digital LLC, 2 Oliver Street, 11th Floor, Boston, MA 02109 as its forensic expert. In addition, comScore's proposed revisions to Plaintiffs' Proposed Protective Order (Dkt. No. 236-1) are attached hereto as Exhibit A. comScore submits these proposed revisions more accurately reflect the Court's October 16, 2013 Order and the parties' discussions with the Court during the October 16, 2013 hearing.

DATED: October 22, 2013

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/s/ Andrew H. Schapiro

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Attorneys for Defendant comScore, Inc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of COMSCORE'S DESIGNATION OF FORENSIC EXPERT AND SUBMISSION OF PROPOSED REVISIONS TO PLAINTIFFS' PROPOSED PROTECTIVE ORDER GOVERNING PRODUCTION OF PLAINTIFF DUNSTAN'S HARD DRIVE has been caused to be served on October 22, 2013 to all counsel of record via email.

/s/ Robyn Bowland

Robyn Bowland