

**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 ROBYN BOWLAND

I, Robyn Bowland, hereby declare and state based upon my personal knowledge as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan LLP. I am admitted to practice law in the state of Illinois and represent comScore, Inc. (“comScore”) in the above-titled action. This declaration is based on my personal knowledge, except where expressly noted otherwise.

2. On Oct. 22, 2013 comScore produced an Excel spreadsheet in native format Bates labeled CS0096515 and titled “CS0096515_Confidential—Attorney’s Eyes Only” to Plaintiffs.

[REDACTED]

[REDACTED]

3. A true and correct copy of excerpts from a November 1, 2013 letter sent to Rafey Balabanian, counsel for Plaintiffs, is attached as Exhibit A to this Declaration. Portions of Exhibit A not relevant to the Plaintiff Jeff Dunstan's Renewed Motion to Compel comScore, Inc. to Respond to Plaintiffs' Written Discovery (Dkt. No. 247) have been redacted.


4. A true and correct copy of a document Bates labeled CS0016810, produced by comScore on April 13, 2012 and marked "Confidential," is attached as Exhibit B to this Declaration.

5. A true and correct copy of the Google Search Engine Optimization Starter Guide, available at available at http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/webmasters/docs/search-engine-optimization-starter-guide.pdf, which I accessed Nov. 6, 2013, is attached as Exhibit C to this Declaration.

6. A true and correct copy of an October 3, 2013 letter sent to Rafey Balabanian, counsel for Plaintiffs, is attached as Exhibit D to this Declaration.

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

Executed this 6th of November, 2013.



Robyn M. Bowland
Attorney for comScore, Inc.