

EXHIBIT A

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November 1, 2013

VIA E-MAIL

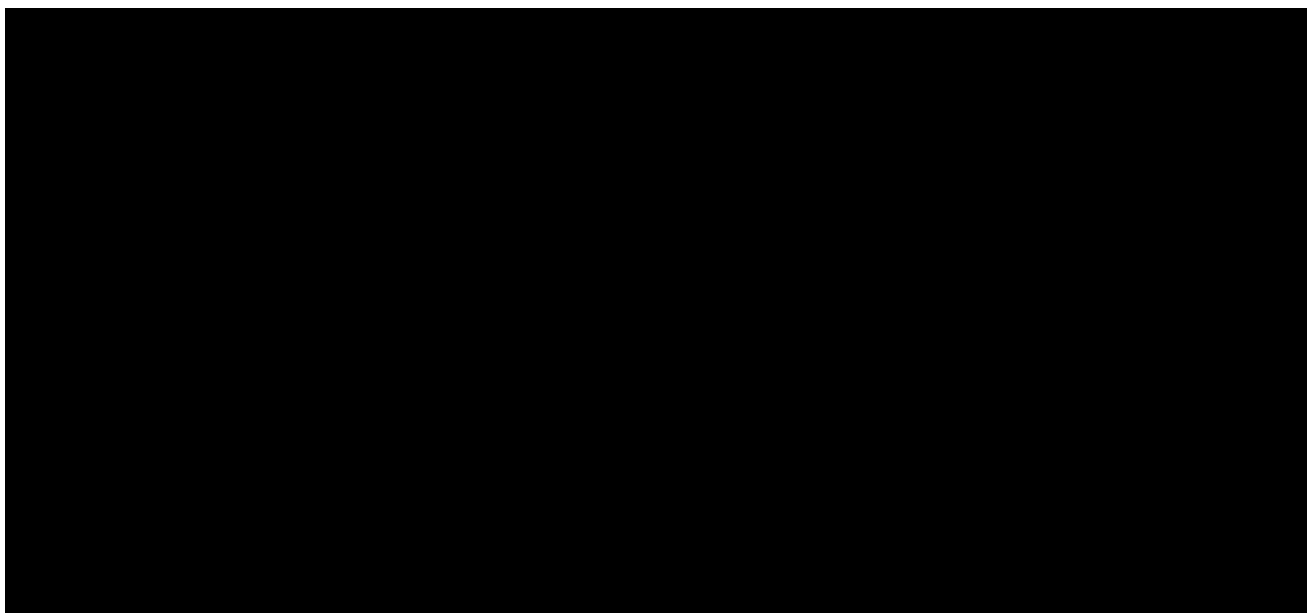
Rafey Balabanian
Edelson LLC
350 N. LaSalle Dr., Ste. 1300
Chicago, IL 60654

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

Dear Rafey:

I write in response to your letter of October 28, 2013 and the parties' meet and confer on October 30, 2013.

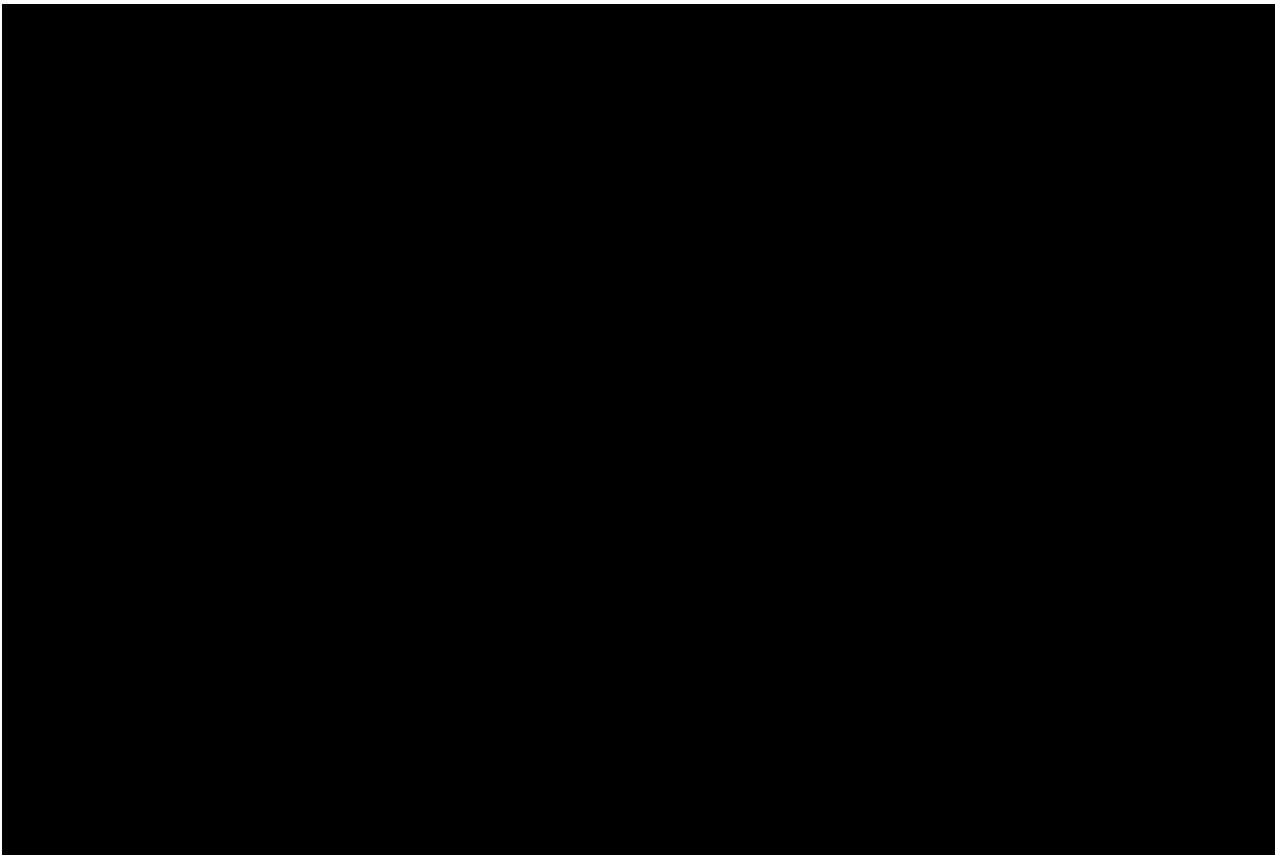
Noticed Depositions of Class Plaintiffs



quinn emanuel urquhart & sullivan, llp

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Rafey Balabanian
November 1, 2013



Emails of Certain comScore Executives

During the meet and confer, Plaintiffs complained that comScore failed to produce all emails from certain comScore Executives—namely Magid Abraham, Linda Abraham, and Chris Lin. comScore explained that it made a good faith search for documents relevant to Plaintiffs’ Document Requests and produced all relevant, non-privileged documents it uncovered by identifying document custodians responsible for areas in which those documents might be located. Plaintiffs have failed to explain what category of documents and/or Document Request responses Plaintiffs feel are deficient related to these Executives. comScore made a good faith effort to produce documents responsive to Plaintiffs’ requests, and will not supplement its production.

Complaints outside comScore’s Complaint System

Plaintiffs also complained that comScore failed to produce complaints that were received by comScore outside its Complaint system. By way of background, comScore maintains several complaint email addresses. When a complaint is received in one of these accounts, the

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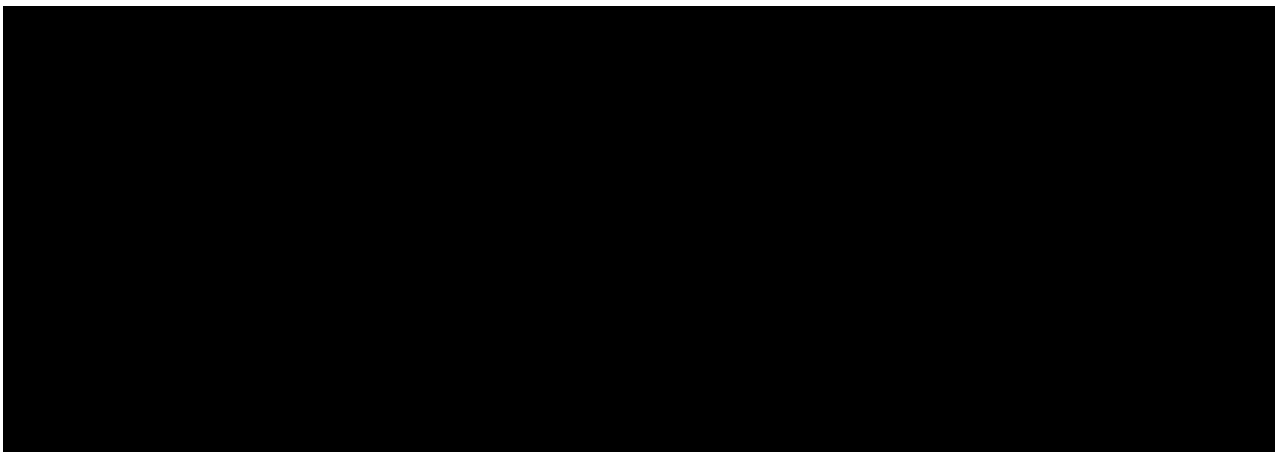
complaint is processed and responded to using comScore's Complaint system. A record of all of these Complaints was produced pursuant to an agreement of the parties. Additionally, and as discussed on the phone, comScore produced any complaints it found during a review of the collected documents that were, for whatever reason, not submitted through the Complaint system. However, Plaintiffs complain that there must be additional complaints that comScore received outside the Complaint system, including complaints Plaintiffs believe comScore must have received from Universities or similar institutions.

comScore made a good faith effort to produce all relevant, non-privileged documents responsive to Plaintiff's requests. What Plaintiffs suggest is required is that comScore go back and search every single document and email ever received by the company to determine whether or not the document or email constitutes a complaint. This far exceeds the "good faith" requirement of the Federal Rules, and would be unduly burdensome. Additionally, to the extent Plaintiffs' claims regarding universities rely on public statements by those universities or policies restricting users from downloading comScore's software, these statements and policies primarily occurred prior to 2005, and the universities did not complain to comScore. Thus, comScore has no relevant "complaints" from these universities to produce.

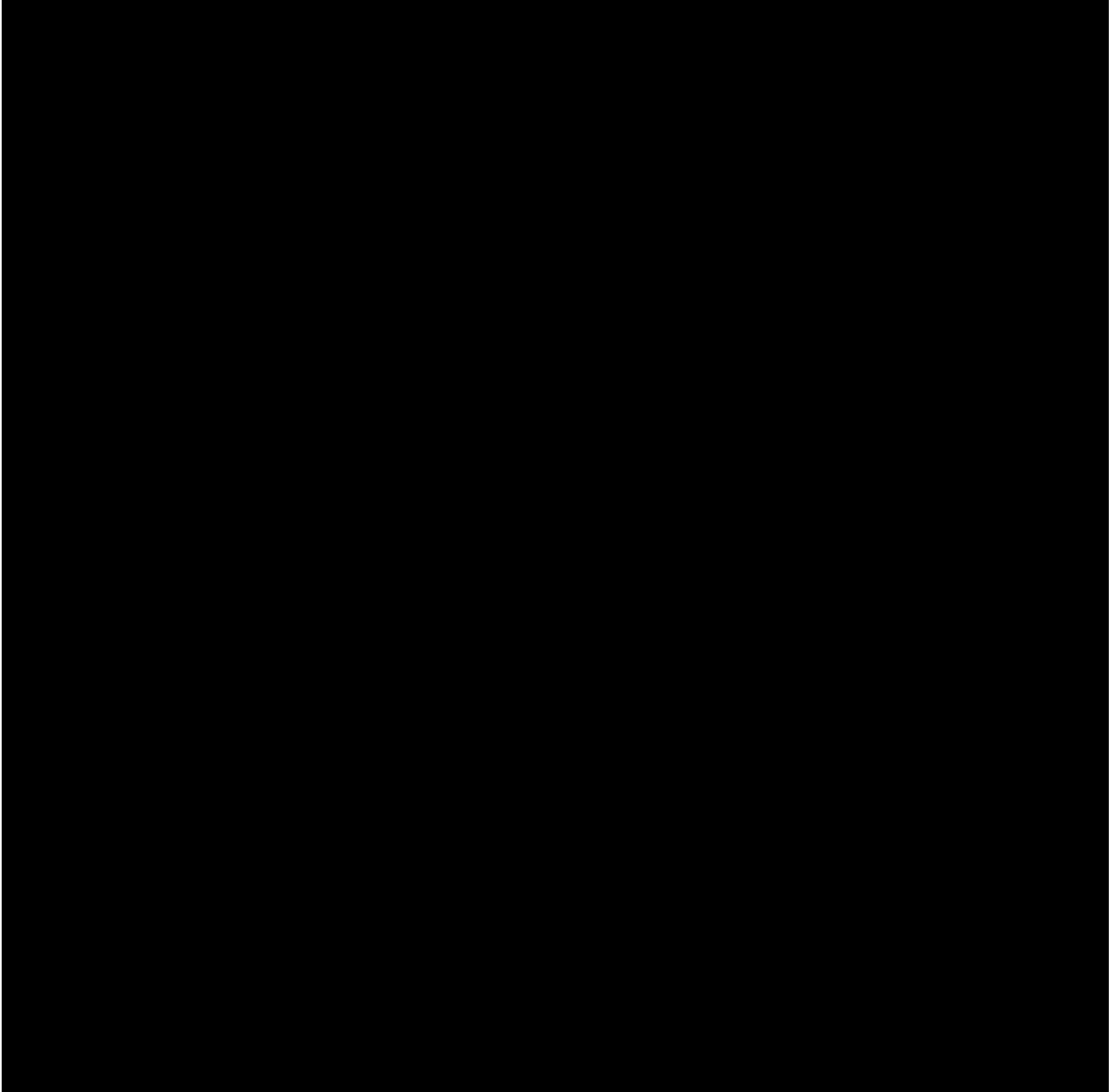
Documents Regarding ULA Revisions

comScore explained during the meet and confer that many of the documents responsive to Plaintiffs' requests regarding revisions to the ULA are privileged, and were therefore not produced. Plaintiffs requested a date certain for a privilege log listing documents withheld due to privilege from comScore's production. comScore will produce a privilege log no later than November 8, 2013.

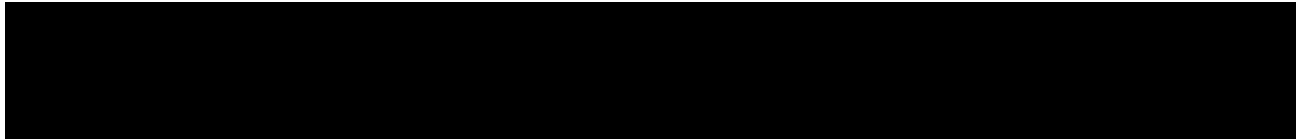
Plaintiffs' Amended Notice Plan



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Regards,

/s/ Robyn Bowland
Robyn Bowland

cc: Jay Edelson
Ari Scharg
Ben Thomassen
Chandler Givens
David Mindell
Andrew Schapiro
Stephen Swedlow
Paul Stack

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