

**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,

Plaintiffs,

v.

COMSCORE, INC., a Delaware corporation,

Defendant.

Case No. 1:11-cv-05807

Hon. James F. Holderman

Magistrate Judge Young B. Kim

PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiffs Mike Harris and Jeff Dunstan (“Plaintiffs”), pursuant to Local Rules 5.8 and 26.2, hereby respectfully move the Court for an Order granting them leave to file certain documents under seal, either in whole or in part, in conjunction with their Amended Motion for Approval of Class Notice Plan (the “Motion”). In support of this Motion, Plaintiffs state as follows:

1. On January 15, 2013, Plaintiffs filed the Motion and the supporting declarations of Rafey S. Balabanian (Balabanian Decl.) and Gina M. Intrepido-Bowen (Intrepido-Bowen Decl.).
2. Attached as Exhibit A to the Balabanian Decl. are excerpts from the Rule 30(b)(6) deposition of comScore, through its designee Mike Brown. comScore has marked the entirety of the transcript as CONFIDENTIAL–ATTORNEYS’ EYES ONLY.
3. Likewise, the Intrepido-Bowen Decl. cites to figures discussed in both the above-mentioned deposition transcript and other documents that comScore has marked as CONFIDENTIAL–ATTORNEYS’ EYES ONLY.

4. The Protective Order entered in this case prohibits either Party from publicly disclosing documents marked as “CONFIDENTIAL,” “CONFIDENTIAL–ATTORNEYS’ EYES ONLY,” or “Highly Confidential–Source Code.” (Dkt. 72, ¶¶ 7, 9.)

WHEREFORE, Plaintiffs respectfully move the Court, pursuant to Local Rules 5.8 and 26.2 for an Order:

- (i) Granting them leave to file Exhibit A of the Balabanian Decl. under seal;
- (ii) Granting them leave to file the Intrepido-Bowen Decl. partially under seal;
- (iii) Providing such other and further relief as the Court deems equitable and just.

Respectfully submitted,

MIKE HARRIS AND JEFF DUNSTAN,
INDIVIDUALLY AND ON BEHALF OF A CLASS OF
SIMILARLY SITUATED INDIVIDUALS,

Dated: November 8, 2013

By: s/ Benjamin S. Thomassen
One of Plaintiffs’ Attorneys

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CERTIFICATE OF SERVICE

I, Benjamin S. Thomassen, an attorney, certify that on November 8, 2013, I served the above and foregoing *Plaintiffs' Motion to File Documents Under Seal*, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system, on this 8th day of November 2013.

s/ Benjamin S. Thomassen