

# EXHIBIT B

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

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**Chandler Givens** <cgivens@edelson.com>  
To: Amir Missaghi <amissaghi@edelson.com>

Wed, Nov 6, 2013 at 11:10 AM

----- Forwarded message -----

From: **Robyn Bowland** <RobynBowland@quinnemanuel.com>

Date: Wed, Nov 6, 2013 at 11:00 AM

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

To: Chandler Givens <cgivens@edelson.com>

Cc: Rafey Balabanian <rbalabanian@edelson.com>, Jay Edelson <jedelson@edelson.com>, Ben Thomassen <bthomassen@edelson.com>, Ari Scharg <ascharg@edelson.com>, David Mindell <dmindell@edelson.com>, Andy Schapiro <AndrewSchapiro@quinnemanuel.com>, Stephen Swedlow <StephenSwedlow@quinnemanuel.com>, Paul Stack <pstack@stacklaw.com>

Chandler,

I write to follow-up on our meet and confer yesterday regarding the files comScore's expert retrieved from the image of Plaintiff Dunstan's hard drive.

Based on our conversation, I understand our experts pulled the following types of files from the image of Dunstan's hard drive: a file listing, Windows registry information, event logs, log files, internet browsing history, and a listing of emails without the body of the emails themselves. Plaintiffs objected to the collection of information past the alleged date Dunstan downloaded comScore's software, and the collection of internet browsing history and emails.

As I mentioned on the phone, comScore believes internet browsing history and the listing of emails is relevant to comScore's concerns about the operation of Dunstan's computer, particularly with respect to computer viruses. Additionally, Dunstan's browsing history just before, during, and just after the removal of comScore's software is relevant to Plaintiffs' claims, in that some of them depend on a panelist's activities online. Thus, comScore contends this email and browsing information was properly collected and should be provided to comScore.

With respect to the timeframe involved, comScore proposes the following: limiting collection of the file listing, internet browsing history, and listing of emails so that no files created after September 1, 2010 are collected and/or listed. All other files collected are related to the operation of the computer and not Dunstan's activities on the computer. These files should be produced regardless of timeframe, because they may provide information regarding any ongoing issues the computer may have had. Please let us know if this proposal is acceptable to you. Also, please let us know if you have the capability to remove the post-September 1, 2010 data from the three categories of data listed above. If not, we will attempt to coordinate with our expert to do so.

Regards,

**Robyn Bowland**

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