

Exhibit 10
(filed partially
under seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MIKE HARRIS and JEFF DUNSTAN,	x	
individually and on behalf of :	:	
a class of similarly situated :	:	
individuals,	:	
	:	
	:	
Plaintiffs,	:	Case No. 1:11-5807
vs.	:	Hon. James F. Holderman
	:	
COMSCORE, INC., a Delaware	:	
corporation,	:	
	:	
	:	
Defendant.	x	

Wednesday, September 12, 2012

Reston, Virginia

DEPOSITION OF:

YVONNE BIGBEE,

a witness, called for oral examination by counsel for plaintiffs in the above-captioned matter, pursuant to Notice and agreement of the parties as to time and date, held at the offices of ComScore, Inc., 11950 Democracy Drive, Suite 600, Reston, Virginia 20191, beginning at approximately 9:30 o'clock, a.m., before Patricia Klepp, RMR, a court reporter and Notary Public in and for the Commonwealth of Virginia, when were present on behalf of the respective parties:

1 P R O C E E D I N G S

2 Thereupon,

3 YVONNE BIGBEE,

4 a witness, was called for examination by counsel for the
5 plaintiffs, and after having first been duly sworn by
6 the Notary Public, was examined and testified as
7 follows:

8 EXAMINATION BY COUNSEL FOR PLAINTIFFS

9 BY MR. THOMASSEN:

10 Q. Good morning.

11 A. Good morning.

12 Q. The record should reflect that this is the
13 oral deposition of Yvonne Bigbee, taken pursuant to
14 notice, in the Dunstan v. comScore matter, Case
15 No. 11-CV-5807 in the Northern District of Illinois.

16 Now, you've just been sworn in. Is this your
17 first deposition?

18 A. Yes, it is.

19 Q. Okay. Before we get started, I'll go over a
20 few ground rules that will help us today.

21 The first and most important is that you have
22 to give verbal answers to all my questions, and the

1 Q. Sure. So can you explain to me what you mean
2 by "collection confirmation"?

3 A. To -- they make sure that our software is
4 collecting the data as expected --

5 Q. Okay.

6 A. -- into our system.

7 Q. And so to the extent you know, can you explain
8 to me how they would confirm that it is collecting the
9 data it's supposed to be collecting?

10 A. They would mimic panelists' behavior. So they
11 would use a popular browser such as IE, Internet
12 Explorer, to surf to CNN.com, for example, and click on
13 a few articles to make sure that the URL is collected
14 properly.

15 Or they would conduct a mystery shop on
16 Amazon.com., for example, where they would put something
17 in the basket as a user to make sure that comScore
18 software is collecting the data properly and
19 fuzzification is in place.

20 Q. Okay. And so can you tell me what you mean by
21 "fuzzification"?

22 A. It's a system that we have in place to look

1 for patterns in the data, to make sure that we either X
2 out or hash any data that we deem to be sensitive to the
3 user.

4 Q. Okay. Before we get too far away for it, you
5 talked about collecting information -- I know you're
6 just using an example -- on Amazon.com.

7 In that example, what sort of information
8 would be collected by comScore software?

9 A. Products viewed. So if I went and looked at
10 The Hunger Games book, for example, we would collect the
11 product, the book name, we would collect the items in
12 your shopping cart, so ...

13 Q. Do you understand the difference between page
14 data and post data?

15 A. Yes.

16 Q. Can you explain that difference to me?

17 A. Page data is the content as it appears on the
18 page to the user, most commonly in the form of HTML.

19 Post data is when the user submits data,
20 oftentimes they enter themselves, to the destination web
21 server.

22 Q. So would that be -- in the Amazon process you

1 A. Can you repeat the question?

2 MR. SWEDLOW: Objection.

3 BY MR. THOMASSEN:

4 Q. Give me an example of HTML information that
5 OSSProxy would not capture.

6 A. Information from dot-edu sites, university
7 sites; information from a personal Google mail contact,
8 we don't collect that.

9 Q. So the -- why would comScore not collect
10 information on dot-edu sites, page data information?

11 Let me start over. Why would comScore not
12 collect HTML page data information from dot-edu sites?

13 A. It's not part of our business model to collect
14 activities from universities --

15 Q. Okay.

16 A. -- student activities.

17 Q. And so then you talked about personal Google
18 mail. That's a -- that would be a dot-com site; right?

19 A. Yes.

20 Q. Why would comScore not collect all the HTML
21 information on a Google.com e-mail site?

22 A. Because we don't want to collect personal

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CERTIFICATE OF NOTARY PUBLIC

1

2 I, Patricia Klepp, RMR, the officer before whom

3 the foregoing deposition was taken, do hereby certify

4 that the witness whose testimony appears herein was duly

5 sworn by me; that the testimony of said witness was

6 taken by me in shorthand and this transcript typed under

7 my direction; that said transcript is a true record of

8 the testimony given by said witness; that I am neither

9 counsel for, related to, nor employed by any of the

10 parties to the action in which this deposition was

11 taken; and, further, that I am not a relative or

12 employee of any attorney or counsel retained by the

13 parties hereto, nor financially or otherwise interested

14 in the outcome of the action.

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18 PATRICIA KLEPP, RMR

19 Notary Public in and for the

20 Commonwealth of Virginia

21 Registration No. 119760

22 My commission expires:
November 30, 2012