

**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-5807

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, respectfully move the Court for an Order granting them leave to file a document under seal in conjunction with Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. In support of this Motion, Plaintiffs state as follows:

1. On February 20, 2014, concurrently with the filing of this Motion, Plaintiffs filed their Motion for Preliminary Approval of Class Action Settlement (the “Motion”), the Declaration of Rafey S. Balabanian (the “Balabanian Declaration”), the Parties’ Class Action Settlement Agreement (the “Settlement Agreement”), and, attached to and filed in support of the Settlement Agreement, Exhibits A – H.

2. Plaintiffs understand the need to file their Motion and other settlement papers on the public record, both for the interest of putative settlement class members and for other interested members of the public at large.

3. That said, Plaintiffs believe that the content of Exhibit H to the Settlement Agreement both (i) unnecessarily risks compromising the integrity of the Settlement Agreement

and (ii) has no bearing whatsoever on the substance or effect of the Settlement Agreement as it relates to the interests of the putative settlement class.

4. Therefore, in the interests of preserving the integrity of the Settlement Agreement—which Class Counsel strongly believes is in the best interests of all Class members—good cause exists to file Exhibit H to the Settlement Agreement under seal.

5. Counsel for Plaintiffs discussed the instant request with counsel for Defendant comScore, Inc., who, in turn, indicated that comScore does not oppose this motion.

WHEREFORE, Plaintiffs Mike Harris and Jeff Dunstan respectfully move the Court, pursuant to Local Rules 5.8 and 26.2 for an Order granting them leave to file entirely under seal Exhibit H to the Parties' Class Action Settlement Agreement;

Dated: May 30, 2014

Respectfully submitted,

MIKE HARRIS and JEFF DUNSTAN,
individually and on behalf of all others
similarly situated,

By: s/ Rafey S. Balabanian
One of Plaintiffs' Attorneys

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Attorneys for Plaintiffs, the Class, and the Subclass

CERTIFICATE OF SERVICE

I, Rafey S. Balabanian, an attorney, certify that on May 30, 2014, 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, and further by causing true and accurate copies of such paper to be transmitted to all counsel of record via electronic mail.

s/ Rafey S. Balabanian _____