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,) No. 11 C 5807
)
V.) Judge Holderman
)
COMSCORE, INC., a Delaware corporation,) Magistrate Judge Kim
)
)
Defendant.)

DEFENDANT'S MOTION TO BIFURCATE DISCOVERY

Now comes COMSCORE, INC., Defendant herein, by its attorneys, and pursuant to Rules 1 and 26 of the Federal Rules of Civil Procedure, moves this Honorable Court to bifurcate discovery in the instant matter so as to permit discovery relating to issues of class certification to go forward while staying discovery on remaining issues until further order of Court.

Defendant submits herewith a Memorandum of Law in support of this Motion.

Respectfully submitted,

Whitty Somvichian
Michael G. Rhodes (admitted pro hac vice)
Whitty Somvichian (admitted pro hac vice)
Ray Sardo (admitted pro hac vice)
COOLEY LLP
101 California Street, 5th Floor
San Francisco, CA 94111
Telephone: (415) 693-2000
rhodesmg@cooley.com
wsomvichian@cooley.com
rsardo@cooley.com

Paul F. Stack
Paul F. Stack
Mark W. Wallin
STACK & O'CONNOR CHARTERED
Suite 411
140 South Dearborn Street
Chicago, Illinois 60603

Attorneys for Defendant comScore, Inc.

1250726/SF