

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT, LOUIS
ROBINSON, and MICHAEL LERRO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Civil Action No.: 1:22-cv-05037-AKH

**SUPPLEMENTAL DECLARATION OF ALEX SPIRO IN FURTHER SUPPORT OF
DEFENDANTS' MOTION FOR RULE 11 SANCTIONS**

I, Alex Spiro, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the bar of this Court and of the firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendants Elon Musk and Tesla, Inc. in the above-captioned action.
2. I respectfully submit this supplemental declaration in support of Defendants' Motion For Rule 11 Sanctions (Dkt. 86).
3. Attached hereto as **Exhibit A** is a true and correct copy of email correspondence, with attachment, from Evan Spencer to Alex Spiro with carbon copies to Rob Kimtis, Sarah Heaton Concannon, Brenna Nelinson, and ahuebert@tesla.com dated July 14, 2023.
4. Attached as **Exhibit B** is a true and correct copy of a redline comparison of the Rule 11 motion served on Plaintiffs on June 22, 2023 and the Rule 11 motion filed on July 14, 2023 (Dkt. 87).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2023 in New York, New York.

Alex Spiro

Alex Spiro