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Lead Counsel for Lead Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

In re Carvana Co. Securities Litigation

No. CV-22-2126-PHX-MTL

This Document Relates To:

All Actions.

DECLARATION OF SARAH A.
FALLON IN SUPPORT OF LEAD
PLAINTIFFS' MOTION TO COMPEL
THE PRODUCTION OF DOCUMENTS
IMPROPERLY WITHHELD AS
PRIVILEGED BY THE CARVANA
DEFENDANTS

1 1. I am an attorney duly licensed to practice before all of the courts of the State of
 2 California. I am an associate of the law firm of Robbins Geller Rudman & Dowd LLP, one
 3 of the counsel of record for Plaintiffs in the above-entitled action. I have personal
 4 knowledge of the matters stated herein and, if called upon, I could and would competently
 5 testify thereto.

6 2. Attached are true and correct copies of the following exhibits:

7 Exhibit 1: Ernest Garcia III's Responses and Objections to Lead Plaintiffs' First
 8 Set of Requests for Admission, dated June 9, 2025;

9 Exhibit 2: Mark Jenkins's Responses and Objections to Lead Plaintiffs' First Set
 of Requests for Admission, dated June 9, 2025;

10 Exhibit 3: Stephen Palmer's Responses and Objections to Lead Plaintiffs' First
 Set of Requests for Admission, dated June 9, 2025;

11 Exhibit 4: Michael Maroone's Responses and Objections to Lead Plaintiffs' First
 12 Set of Requests for Admission, dated June 9, 2025;

13 Exhibit 5: Neha Parikh's Responses and Objections to Lead Plaintiffs' First Set of
 Requests for Admission, dated June 9, 2025;

14 Exhibit 6: Ira Platt's Responses and Objections to Lead Plaintiffs' First Set of
 15 Requests for Admission, dated June 9, 2025;

16 Exhibit 7: Greg Sullivan's Responses and Objections to Lead Plaintiffs' First Set
 of Requests for Admission, dated June 9, 2025;

17 Exhibit 8: Carvana's Amended Responses and Objections to Lead Plaintiffs' First
 18 Set of Interrogatories to the Carvana Defendants, dated July 18, 2025;

19 Exhibit 9: Defendant Ernest Garcia III's Amended Responses and Objections to
 20 Lead Plaintiffs' First Set of Interrogatories to the Carvana Defendants,
 dated July 18, 2025;

21 Exhibit 10: Defendant Mark Jenkins's Amended Responses and Objections to Lead
 22 Plaintiffs' First Set of Interrogatories to the Carvana Defendants, dated
 July 18, 2025;

23 Exhibit 11: Carvana Defendants' Rule 26(a)(1) Initial Disclosures, dated February
 18, 2025;

24 Exhibit 12: Carvana Defendants' Amended Rule 26(a)(1) Initial Disclosures, dated
 25 March 21, 2025;

26 Exhibit 13: Carvana Defendants' Amended Rule 26(a)(1) Initial Disclosures, dated
 August 19, 2025;

27 Exhibit 14: Email chain ending with a January 6, 2026 email to Tor Gronborg from
 28 Christian Word;

1 Exhibit 15: Carvana Defendants' Categorical Privilege Log, dated October 31,
2 2025 (**FILED UNDER SEAL**); and

3 Exhibit 16: Email chain ending with a January 28, 2026 email to Christian Word
4 from Sarah Fallon.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed on
6 February 5, 2026, at San Diego, California.

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SARAH A. FALLON