

EXHIBIT D

**JOINT DECLARATION OF THE NIKOLA INVESTOR GROUP
IN SUPPORT OF MOTION TO CONSOLIDATE, FOR APPOINTMENT AS LEAD
PLAINTIFFS, AND APPROVAL OF SELECTION OF LEAD COUNSEL**

The undersigned, under penalty of perjury under the laws of the United States of America, declare as follows:

1. We respectfully submit this Joint Declaration in support of our motion for appointment as Lead Plaintiffs in the above-referenced action and approval of our selection of Lead Counsel (the “Motion”). We each have personal knowledge about the information in this Joint Declaration relating to our ourselves.

2. I, Vincent (Vi Kinh) Chau, am a resident of Sugar Land, Texas. I am 53 years old and have over 20 years of experience investing in the securities markets. I am the President of Great Prosperity Equities, Inc., and have worked in commercial and residential real estate investment since approximately 1990. My certification and loss chart attached to the Motion detail my transactions in Nikola securities.

3. I, George Mersho, am a resident of San Jose, California. I am 52 years old and have over 20 years of experience investing in the securities markets. I have been the CEO of Shoe Palace Corporation for approximately 30 years. My certification and loss chart attached to the Motion detail my transactions in Nikola securities.

4. I, Stanley Karcynski, am a resident of Bernardsville, New Jersey. I am 71 years old and have approximately 25 years of experience investing in the securities markets. I am a commercial and industrial real estate developer. My certification and loss chart attached to the Motion detail my transactions in Nikola securities.

5. On November 10, 2020, we each participated in a conference call with our counsel to discuss moving for appointment as Lead Plaintiffs and to select Block & Leviton LLP

and Pomerantz LLP to be our Co-Lead Counsel, with Labaton Sucharow LLP as additional counsel. We have contact information for each other to allow for the communication absent the presence of counsel.

6. During the call we discussed whether we should jointly move to be the Lead Plaintiffs in this action. We decided that given our losses, and that our losses are relatively in line with each other, that we would jointly move to be Lead Plaintiffs. We discussed our role and responsibilities as the Lead Plaintiffs and asked questions regarding the case, its prosecution, and possible resolution.

7. We discussed on the call that we would attempt to reach decisions via consensus in a collective and collaborative manner but, if we were unable to reach a consensus, that we would put any issue to a majority vote.

8. After participating in this conference call, we decided to move together as a group for appointment as Lead Plaintiffs in this securities class action and to propose as Co-Lead Counsel for the Class the law firms of Block & Leviton LLP and Pomerantz LLP, with Labaton Sucharow LLP as additional counsel.

9. We believe that the Court should appoint us as Lead Plaintiffs because we are experienced investors with a significant interest in the outcome of the litigation and we have the capability and competency to oversee this litigation to a successful conclusion.

10. We are capable of actively participating in this action and are committed to doing so, in part by working with our Lead Counsel to obtain the best possible recovery for the Class in an efficient manner.

11. Before deciding to seek appointment as Lead Plaintiffs, we carefully considered the merits of this action and our respective losses. We reviewed the filed complaint and discussed the merits of the case and our losses with our counsel.

12. We understand that one of our primary responsibilities will be overseeing Co-Lead Counsel to ensure that the litigation is handled efficiently, and that the resulting fees and expenses are fair and reasonable, relative to the size, complexity, and risk of the litigation.

13. We understand that each of us could have chosen to pursue individual actions, made a motion for appointment as Lead Plaintiff individually, or taken no action and remained absent class members. However, based on our respective financial losses and desire to actively oversee this litigation, we affirmatively decided that it would be a benefit to ourselves and the Class we seek to represent if we sought appointment as Lead Plaintiffs in a cohesive group.

14. We are committed to the zealous prosecution of this case and will remain actively involved in it, including through our attendance at deposition and trial, if necessary. We understand that if appointed as Lead Plaintiffs, we owe a fiduciary duty to all members of the putative class to provide fair and adequate representation and to work with Co-Lead Counsel to obtain the largest possible recovery for the class consistent with good faith and vigorous advocacy.

15. We each have knowledge of the requirements and responsibilities of lead plaintiffs in a securities class action. We have agreed to exercise joint decision making and to work together if appointed in this action to fairly and adequately protect the interests of the Class. We will also have at least quarterly calls with counsel to discuss the status of the litigation and ensure its proper prosecution. We will have additional calls as events and circumstances in the litigation may warrant. We have selected Co-Lead Counsel in this action based upon their

experience and resources, and we are confident in our ability to work with our counsel to protect the interest of the Class.

16. We understand that, as Lead Plaintiffs in this action, we are subject to the jurisdiction of the Court and will be bound by all rulings of the Court, including rulings regarding any judgments.

17. As Lead Plaintiffs, we shall be responsible for directing the activities of our counsel for the duration of the litigation, who shall:

- a. Determine and present the position of Lead Plaintiffs on all matters that may arise during litigation of the action;
- b. Coordinate the initiation of and conduct discovery on behalf of Lead Plaintiffs, including the preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
- c. Conduct settlement negotiations on behalf of Lead Plaintiffs;
- d. Negotiate and enter into those stipulations with opposing counsel necessary for the conduct of the litigation;
- e. Retain expert consultants and witnesses;
- f. Prepare and distribute periodic status reports to the Lead Plaintiffs;
- g. Maintain adequate time and disbursement records covering services as Co-Lead Counsel; and
- h. Perform such other duties as may be incidental to the proper and efficient coordination of the litigation or which may be authorized by further order of the Court.

Signed under penalties of perjury under the laws of the United States of America:

Vincent (Vi Kinh) Chau



Dated: 11 / 12 / 2020

George Mersho



Dated: 11 / 13 / 2020

Stanley Karcynski



Dated: 11-12-20

