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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 TATIANA PAVLOVA-COLEMAN,
19 individually and on behalf of all others
20 similarly situated,

21 Plaintiff,

22 v.

23 SPLUNK INC., DOUGLAS MERRITT, and
24 JASON CHILD,

25 Defendants.

Case No. _____

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE FEDERAL
SECURITIES LAWS**

JURY TRIAL DEMANDED

26 Plaintiff, Tatiana Pavlova-Coleman, (“Plaintiff”), by and through her attorneys, alleges
27 upon personal knowledge as to her own acts, and upon information and belief as to all other
28 matters, based upon the investigation conducted by and through her attorneys, which included,
among other things, a review of documents filed by Defendants (as defined below) with the
United States Securities and Exchange Commission (the “SEC”), news reports, press releases

NATURE AND SUMMARY OF THE ACTION

1
2 1. This is a federal securities class action on behalf of all investors who purchased or
3 otherwise acquired Splunk Inc. (“Splunk” or the “Company”) common stock between October
4 21, 2020 and December 2, 2020, inclusive (the “Class Period”), seeking to recover damages
5 caused by Defendants’ violations of the federal securities laws and to pursue remedies under
6 §§ 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Rule 10b-5
7 promulgated thereunder by the SEC, 17 C.F.R. § 240.10b-5.
8

9 2. According to its most recent Annual Report filed on Form 10-K with the U.S.
10 Securities and Exchange Commission (the “SEC”), Splunk “provides innovative software
11 solutions that ingest data from different sources including systems, devices and interactions, and
12 turn that data into meaningful business insights across the organization.” Splunk states that its
13 “Data-to-Everything platform enables users to investigate, monitor, analyze and act on data
14 regardless of format or source.” Splunk common stock trades on the NASDAQ stock exchange
15 under the ticker symbol “SPLK.” The Company is headquartered in San Francisco, CA.
16

17 3. On October 21, 2020, just ten days before the close of Splunk’s 2021 third fiscal
18 quarter, Splunk held a call with several analysts at the Virtual Analyst & Investor Session at
19 .conf.20. On this call, and as detailed more completely herein, Splunk assured investors that
20 everything was on track for its third quarter 2021 financial results.
21

22 4. Throughout the Class Period and in violation of the Exchange Act, Defendants
23 made materially false and/or misleading statements, as well as failed to disclose material adverse
24 facts to investors. Specifically, Defendants misrepresented and/or failed to disclose to investors
25 that: (1) Splunk was not closing deals with its largest customers in the third fiscal quarter of
26 2021; (2) Splunk was not hitting the financial targets it had previously announced; and (3) as a
27 result of the foregoing, Defendants’ public statements were materially false and misleading at all
28

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