

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PEDRO RAMIREZ, JR., Individually and on Behalf of All Others Similarly Situated,	§	Civil Action No. 3:16-cv-03111-K
	§	
Plaintiff,	§	<u>CLASS ACTION</u>
	§	
vs.	§	
	§	
EXXON MOBIL CORPORATION, et al.,	§	
	§	
Defendants.	§	
	§	

NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS WHO PURCHASED OR OTHERWISE ACQUIRED EXXON MOBIL CORPORATION COMMON STOCK BETWEEN FEBRUARY 24, 2016, AND OCTOBER 28, 2016, INCLUSIVE, AND WERE DAMAGED THEREBY.

A federal court has authorized this Notice. This is not a solicitation from a lawyer.

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.
YOU MAY BE A MEMBER OF THE CLASS DESCRIBED HEREIN.**

**AS SUCH, YOUR RIGHTS MAY BE AFFECTED BY A PENDING CLASS ACTION LAWSUIT.
THIS NOTICE ADVISES YOU OF YOUR OPTIONS REGARDING THE CLASS ACTION.**

PLEASE DO NOT CALL OR WRITE THE COURT.

**IF YOU HAVE ANY QUESTIONS AFTER READING THIS NOTICE, YOU SHOULD CONTACT
CLASS COUNSEL OR THE ADMINISTRATOR, AS DISCUSSED FURTHER BELOW.**

This Notice is being sent pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of Texas, Dallas Division (the "Court") to inform you: (a) of a class action lawsuit that is now pending in the Court under the above caption (the "Action") in which the following persons are or were named as defendants: Exxon Mobil Corporation ("ExxonMobil" or the "Company"), Rex W. Tillerson, Andrew P. Swiger, Jeffrey J. Woodbury, and David S. Rosenthal (collectively, "Defendants"); and (b) that the Court certified a Class (as that term is defined in Paragraph 1 below) for certain of Lead Plaintiff's claims. This Notice is not a settlement notice and you are not being asked to submit a claim.

1. By an order dated August 21, 2023, granting in part and denying in part Lead Plaintiff's motion for class certification, the Court certified the following class (the "Class"):

All persons who purchased or otherwise acquired Exxon Mobil Corporation common stock between February 24, 2016, and October 28, 2016, inclusive, and were damaged thereby. ECF 178.

Excluded from the Class are Defendants and their families, the officers and directors of ExxonMobil, at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns, and any entity in which Defendants have or had a controlling interest.

2. This Notice is directed to you because you may be a member of the Class. If you are a member of the Class, your rights will be affected by this Action. If you do not meet the Class definition, this Notice does not apply to you. If you are uncertain whether you are a member of the Class, contact Class Counsel listed in Paragraph 23 below, or your own attorney.

3. This Notice is **not** an admission by Defendants or an expression of any opinion by the Court as to the merits of the Action, or a finding by the Court that the claims asserted by Lead Plaintiff in this Action are valid. This Notice is intended solely to inform you of the pendency of this Action and of your rights in connection with it, including the right to request exclusion from the Class. There is no judgment, settlement, or monetary recovery at this time, and there may be no judgment, settlement, or monetary recovery in favor of the Class at any time in the Action. Defendants have denied and continue to deny any wrongdoing and each and all of the claims alleged in the Action and deny that the members of the Class suffered any damages or were otherwise harmed by the conduct alleged in the Action.

4. The Class definition may be subject to change by the Court pursuant to Rule 23 of the Federal Rules of Civil Procedure.

DESCRIPTION AND STATUS OF THE LAWSUIT

5. This is a securities class action brought against Defendants for alleged violations of the federal securities laws. Lead Plaintiff alleges that certain Defendants made material misrepresentations and omissions of material facts in certain public statements during the Class Period. Defendants deny the allegations of wrongdoing asserted in the Action and deny any liability whatsoever to any members of the Class.

6. On May 3, 2017, the Court appointed Lead Plaintiff to lead the consolidated Action and appointed Robbins Geller Rudman & Dowd LLP as Lead Counsel. ECF 29.

7. On July 26, 2017, Lead Plaintiff filed the Consolidated Complaint against all Defendants, alleging that those Defendants violated §§10(b) and 20(a) of the Securities Exchange Act of 1934. ECF 36.

8. On August 14, 2018, the Court granted in part and denied in part Defendants' motion to dismiss the Consolidated Complaint. ECF 62.

9. On September 27, 2018, Defendants filed their Answer to the Consolidated Complaint, denying all wrongdoing and asserting affirmative and other defenses. ECF 72.

10. Please note that this Notice does not fully describe all claims and defenses asserted by the parties. The section entitled "Where You Can Find Additional Information" describes the process by which you can obtain additional information about the Action and the claims and defenses asserted.

11. On December 21, 2018, Lead Plaintiff filed its motion for class certification. ECF 86.

12. As mentioned above, the Court entered an order on August 21, 2023, granting in part and denying in part Lead Plaintiff's motion for class certification, certifying a Class as defined in Paragraph 1 above, appointing Lead Plaintiff as Class Representative, and appointing Lead Counsel Robbins Geller Rudman & Dowd LLP as Class Counsel.

13. On January 28, 2025, the parties filed a stipulation and proposed order with the Court, documenting the parties' agreement to dismiss defendant Jeffrey J. Woodbury from the case with prejudice. ECF 221.

14. The litigation is ongoing. The parties completed fact and expert discovery in 2025 and are preparing for trial, which is currently scheduled to begin on April 27, 2026. The remaining Defendants have moved for summary judgment, which means they believe the Court can decide the case in their favor without holding a trial. The remaining Defendants' motion for summary judgment is fully briefed and pending.

15. The Court has not made a ruling on the merits of Lead Plaintiff's allegations that remain in the case following the Court's orders on Defendants' motion to dismiss and Lead Plaintiff's motion for class certification, or on Defendants' denials and defenses. By certifying the Class and authorizing this Notice, the Court is not suggesting that the Lead Plaintiff will win or lose this case.

YOUR RIGHTS AS A CLASS MEMBER

16. A class action is a type of lawsuit in which one or several individuals or entities prosecute claims on behalf of all members of a group of similarly situated persons and entities to obtain monetary or other relief for the benefit of the entire group. Class actions avoid the necessity of each member of a class having to file his, her, or its own separate lawsuit to obtain relief. Class actions are used to decide legal and factual issues that are common to all members of a class.

17. If you fall within the definition of the Class set forth in Paragraph 1 above, you are a member of the Class. If you are a member of the Class, you have the right to decide whether to remain a member of the Class. If you are a member of the Class and wish to be excluded from the Class, you must request exclusion in accordance with the procedures set forth in Paragraphs 19-22 below. ***If you want to remain a member of the Class, you do not need to do anything at this time other than to retain your documentation reflecting your transactions and holdings in ExxonMobil common stock. Your decision is important for the following reasons:***

a. **If you choose to remain a member of the Class**, you will be bound by all past, present, and future orders and judgments in the Action, whether favorable or unfavorable. If any money is awarded to the Class, either through a settlement with Defendants or a judgment of the Court after a trial and any appeal, you may be eligible to receive a share of that award. However, if you remain a member of the Class, you may not pursue a lawsuit on your own behalf with regard to any of the issues in this Action. Please note that if you remain a member of the Class, you will not be personally responsible for Class Counsel's attorneys' fees or expenses. Class Counsel have agreed to represent the Class on a contingent fee basis, which means that they will be awarded fees and expenses to be approved by the Court only if they succeed in obtaining a recovery from one or more Defendants. Any attorneys' fees for Class Counsel will be awarded by the Court from the settlement or judgment, if any, obtained on behalf of the Class. As a member of the Class, you will be represented by Class Counsel. Alternatively, you may remain a member of the Class and elect to be represented by counsel of your own choosing. If you do

retain separate counsel, you will be responsible for that attorney's fees and expenses and that attorney must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the address set forth in Paragraph 23 below on or before **February 5, 2026**.

b. **If you choose to be excluded from the Class**, you will not be bound by any orders or judgments in this Action, nor will you be eligible to share in any recovery that might be obtained in this Action. You will retain any right you have to individually pursue any legal recourse that you may have against any Defendants with respect to the claims asserted in the Action. ***Please note, if you decide to exclude yourself from the Class, you may be time-barred by a statute (or statutes) of limitation or repose from asserting the claims covered by the Action.*** Please refer to Paragraphs 19-22 below if you would like to request exclusion from the Class.

18. Members of the Class will be eligible to participate in any recovery that might be obtained in the Action. While this Notice is not intended to suggest any likelihood that Lead Plaintiff or members of the Class will obtain any recovery, if there is a recovery, members of the Class will be required to support their requests to participate in the distribution of the recovery by demonstrating their membership in the Class and documenting their transactions in, and/or holdings of, the relevant securities, and their resulting damages. ***For this reason, please be sure to keep all records of your holdings in this security. DO NOT mail them to Class Counsel or the Administrator at this time.***

HOW TO BE EXCLUDED FROM THE CLASS

19. To exclude yourself from the Class, you must send a letter by first-class mail stating that you "request exclusion from the Class in *Ramirez v. Exxon Mobil Corporation, et al.*, No. 3:16-cv-03111-K (N.D. Tex.)." Your request must state your full name, address, and telephone number, and be signed. If you are signing on behalf of a Class Member (such as an estate, corporation, or partnership), please indicate your full name and the basis of your authority to act on behalf of the Class Member. Your request for exclusion must also state the number of shares of ExxonMobil common stock you purchased or otherwise acquired during the Class Period. You must mail your exclusion request ***such that it is postmarked or received by February 5, 2026*** to:

ExxonMobil Securities Litigation
EXCLUSIONS
Notice Administrator
c/o Verita Global
P.O Box 5100
Larkspur, CA 94977-5100

20. You cannot exclude yourself from the Class by telephone, facsimile, or email. Requests for exclusion that do not comply with the above requirements will be invalid, unless otherwise accepted by the Court, subject to any objections of the parties to be resolved by the Court.

21. Do not request exclusion if you wish to participate in this Action as a member of the Class.

22. If you properly request exclusion from the Class, you will not be bound by any orders or judgments in this Action, but you also will not be eligible to share in any recovery that might be obtained in this Action. If you properly request exclusion from the Class, you will be entitled to pursue an individual lawsuit, claim, or remedy, if available, which you may have, at your own expense. Please note: ***If you decide to exclude yourself from the Class, you may be time-barred from asserting the claims covered by the Action by a statute (or statutes) of limitation or repose.***

CLASS COUNSEL

23. The Court has appointed the law firm of Robbins Geller Rudman & Dowd LLP as Class Counsel. If you have any questions concerning the matters raised in this Notice, you may contact Class Counsel, as follows:

ROBBINS GELLER RUDMAN & DOWD LLP
Scott H. Saham
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
gregw@rgrdlaw.com

24. If you want to be represented by your own lawyer, you may hire one at your own expense.

25. As noted above, unless you elect to retain your own personal lawyer, if you remain in the Class, you will not have any direct obligations to pay the costs of the litigation. If there is a recovery by the Class in this Action, all costs and expenses of the Action, including Class Counsel's attorneys' fees, will be paid from that recovery in an amount approved by the Court.

PLEASE KEEP YOUR ADDRESS CURRENT

26. To assist the Court and the parties in maintaining accurate lists of Class Members, you are requested to mail notice of any changes in your address to:

ExxonMobil Securities Litigation
Notice Administrator
c/o Verita Global
P.O. Box 301171
Los Angeles, CA 90030-1171

27. If this Notice was forwarded to you by the postal service, or if it was otherwise sent to you at an address that is not current, you should immediately contact the Administrator, Verita Global, at the address above or toll-free at 1-888-999-6592 and provide them with your correct address. If the Administrator does not have your correct address, you may not receive notice of important developments in this Action.

WHERE YOU CAN FIND ADDITIONAL INFORMATION

28. This Notice gives only a summary of the lawsuit and the claims asserted by Lead Plaintiff. For more detailed information regarding the Action, you may contact Class Counsel or visit **www.ExxonMobilSecuritiesLitigation.com**.

29. Complete copies of the public pleadings, orders, and other documents filed in this Action are available at <http://www.pacer.gov>, or at the office of the Clerk of Court at the United States District Court for the Northern District of Texas, Dallas Division, 1100 Commerce Street, Dallas, Texas 75242.

NOTICE TO BROKERS

30. If, for the beneficial interest of any person or entity other than yourself, you purchased or otherwise acquired ExxonMobil common stock between February 24, 2016, and October 28, 2016, inclusive, you are requested to send the Postcard Notice to all such beneficial owners/purchasers within seven days after receipt of the Postcard Notice, or to send a list of names, addresses, and, if available, email addresses of such beneficial owners to the Notice Administrator at notifications@veritaglobal.com or the address above, within seven days of receipt thereof, in which event the Notice Administrator shall promptly send the Postcard Notice via First-Class Mail or email to such beneficial owner. If you elect to send the Postcard Notice to your beneficial owners, you are required to send a statement to the Notice Administrator confirming that the mailing was made as directed. Additional copies of the Postcard Notice will be made available to any record holder requesting the Postcard Notice for the purpose of distribution to beneficial owners. Such record holders shall be reimbursed by Class Counsel, upon receipt by the Notice Administrator of proper documentation, for the reasonable expense of sending the Postcard Notice to beneficial owners. Reasonable out-of-pocket expenses actually incurred in connection with the foregoing includes up to \$0.03 for providing names, addresses, and email addresses to the Notice Administrator per record; and up to a maximum of \$0.03 plus postage at the rate used by the Notice Administrator per Postcard Notice. Copies of the Postcard Notice and this Notice will also be posted on the website established and maintained for the class action by the Notice Administrator.

**PLEASE DO NOT CALL OR WRITE THE COURT OR
CLERK OF COURT REGARDING THIS NOTICE.**

DATED: December 8, 2025

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS