

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, § CLASS ACTION

vs.

EXXON MOBIL CORPORATION, et al.,

Defendants.

§

**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE AS
TO DEFENDANT JEFFREY J. WOODBURY**

Pursuant to Federal Rule of Civil Procedure 23(e), the undersigned counsel hereby stipulate to the voluntary dismissal with prejudice of all claims of Lead Plaintiff Greater Pennsylvania Carpenters Pension Fund (“Lead Plaintiff”), on behalf of itself and each of the Class members,¹ against Defendant Jeffrey J. Woodbury (“Woodbury”). In consideration for this dismissal, Jeffrey J. Woodbury hereby fully, finally, and forever releases and relinquishes and discharges Lead Plaintiff, the Class members, and Lead Counsel for any claims, demands, losses, rights, and causes of action of any nature whatsoever, that have been or could have been asserted in the action, or which arise out of or relate in any way to the institution, prosecution, or assertion of the action. Likewise, Lead Plaintiff and the Class hereby fully, finally and forever release and relinquish and discharge Woodbury for any claims, demands, losses, rights, and causes of action whatsoever, that have been or could have been asserted in any complaint filed in the action, or which arise out of or relate to, directly or indirectly, any of the allegations, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in any complaint filed in the action and that arise out of or relate to the purchase or acquisition of the securities of Exxon Mobil Corporation.

Lead Plaintiff, the Class, and Woodbury further agree that they shall not assert any claims of any violation of Rule 11 of the Federal Rules of Civil Procedure relating to the institution, prosecution, or defense of this action and further agree that, with respect to the claims against Woodbury, the parties to this stipulation and their counsel complied with the requirements of Rule 11 with respect to the institution, prosecution, and defense of the action. Lead Plaintiff, the Class, and Woodbury agree that each side will bear its own costs incurred in the litigation.

¹ The Class was defined by, and certified in, the Court’s Memorandum Opinion and Order dated August 21, 2023 (ECF 178).

IT IS SO STIPULATED.

DATED: January 28, 2025

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* * *

O R D E R

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ED KINKEADE
UNITED STATES DISTRICT JUDGE