## **Court-Ordered Legal Notice Forwarding Service Requested**

Important Notice about a Securities Class Action Settlement

You may be entitled to a payment. This Notice may affect your legal rights.

Please read it carefully

Fluor Securities Settlement c/o JND Legal Administration P.O. Box 91325 Seattle, WA 98111

Case No. 3:18-cv-01338-X (N.D. Tex.) Case Pending in U.S. District Court for Northern District of Texas Presorted First Class Mail U.S. Postage PAID Philadelphia, PA Permit No. 5634

## *Chun v. Fluor Corp. et al.*, Case No. 3:18-cv-01338-X (N.D. Tex.) THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT. VISIT WWW.FLUORSECURITIESSETTLEMENT.COM OR CALL 1-888-964-2130 FOR MORE INFORMATION.

If you purchased, or otherwise acquired, the common stock of Fluor Corporation ("Fluor") (NYSE: FLR) between August 14, 2013 and February 14, 2020, both dates inclusive, you could be entitled to a payment from a proposed settlement ("Settlement") reached in this action ("Action"). Your rights may be affected by this Action and the Settlement. A hearing will be held on November 7, 2022, at 10:00 a.m. before the Honorable Brantley Starr, at the United States District Court for the Northern District of Texas, 1100 Commerce Street, Courtroom 1525, Dallas, TX 75242 to determine: whether the proposed Settlement of the Action against Defendants Fluor, David T. Seaton, Biggs C. Porter, Bruce A. Stanski, Matthew McSorley, Gary G. Smalley, Carlos M. Hernandez, D. Michael Steuert, and Robin K. Chopra for thirty-three million dollars (\$33,000,000) and the Plan of Allocation should be approved as fair, reasonable and adequate and whether the Action should be dismissed with prejudice against the Defendants, as set forth in the Stipulation of Settlement ("Stipulation") filed with the Court; whether Lead Counsel's application for an award of attorneys' fees of 30%, plus interest, and expenses not to exceed \$200,000, plus interest, should be granted; and whether Lead Plaintiffs' request for reimbursement of seventy-five thousand dollars (\$75,000) in the aggregate for their time and expenses incurred in representing the Settlement Class should be granted.

The proposed Settlement would resolve a class action lawsuit alleging that, in violation of the U.S. federal securities laws, Defendants made material misrepresentations and omissions, with scienter, concerning the business operations, accounting, and financial reporting concerning Fluor's fixed-price projects. Defendants deny the allegations. For a full description of the Settlement and your rights and to make a claim, you may obtain the Stipulation, long-form Notice of Proposed Settlement of Class Action, and the Proof of Claim and Release Form ("Proof of Claim") by visiting the website: www.FluorSecuritiesSettlement.com (the "Website") or you may request copies from the Claims Administrator by: (1) mail: Fluor Securities Settlement, c/o JND Legal Administration, P.O. Box 91325, Seattle, WA 98111; or (2) call toll-free: (888) 964-2130.

To qualify for payment, you must submit a valid Proof of Claim, with supporting documentation, received no later than **October 14, 2022**. You will be bound by any Judgment entered in the Action, regardless of whether you submit a Proof of Claim, unless you exclude yourself from the Settlement Class, received no later than **October 17, 2022**. If you exclude yourself, you cannot get money from this Settlement. If you stay in the Settlement, you may object to the Settlement, Plan of Allocation, request for award of attorneys' fees and expenses, or Lead Plaintiffs' request for awards no later than **October 17, 2022**. The long-form Notice and the Website explain how to exclude yourself or to object.

Lead Plaintiffs and the Settlement Class are represented by Lead Counsel: Matthew L. Tuccillo, Pomerantz LLP, 600 Third Ave., 20<sup>th</sup> Floor, New York, NY 10016, (212) 661-1100, and Darryl Alvarado, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, (800) 449-4900. You may, but do not have to, attend the Court hearing and be heard.