

## **NOTICE OF PENDENCY OF CLASS ACTION**

**TO: All persons or entities who purchased or otherwise acquired publicly-traded Symantec Corporation (“Symantec”) common stock during the period from May 11, 2017, to August 2, 2018, inclusive (the “Class Period”), and who were damaged thereby (the “Class”).**

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.**

You are receiving this notice because your rights may be affected by a class action lawsuit regarding your purchase or acquisition of publicly-traded common stock of Symantec Corporation (now known as NortonLifeLock Inc.) (“Symantec”). If you are a Class Member, your rights will be affected by this lawsuit, which is referred to as *SEB Investment Management AB v. Symantec Corp., et al.*, Case No. C 18-02902-WHA (the “Action”), and which is now pending before the United States District Court for the Northern District of California (the “Court”). The Court has ordered this notice to be sent to you.

On May 8, 2020, the Court determined that this lawsuit may proceed as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure. You received this notice because you were identified as a potential member of the Class. The purpose of this notice is to inform you how the lawsuit may affect your rights and what steps you may take. This notice is not an expression by the Court of any opinion as to the merits of any of the claims or defenses asserted by either side in the lawsuit. If you received this notice in error and you are not a member of the Class, you do not need to take any action and your rights will not be affected.

### **1. WHY SHOULD YOU READ THIS NOTICE?**

The Court has certified a Class in this lawsuit. The Class consists of persons and entities who purchased or otherwise acquired publicly-traded shares of Symantec common stock during a certain time period. The Class is more fully described below. You may be a member of this Class. You may be entitled to participate in any benefits that may eventually be obtained for the Class as a result of this lawsuit. There is, however, no assurance that a judgment in favor of the Class will be granted.

This notice provides a summary of the lawsuit. It also describes who is eligible to be included in the Class, the effect of participating in this lawsuit as a Class Member, and how to request exclusion from the Class.

### **2. WHAT IS THIS LAWSUIT ABOUT?**

This is a securities lawsuit filed in the United States District Court for the Northern District of California. The operative complaint in the Action names as defendants Symantec and its former Chief Executive Officer, Gregory S. Clark (collectively, “Defendants”). The Court appointed SEB Investment Management AB (“SEB”) as Lead Plaintiff in this lawsuit.

#### **(a) LEAD PLAINTIFF’S CLAIMS**

Lead Plaintiff, on behalf of the Class, alleges that Defendants violated Sections 10(b), 20(a), and 20A of the Securities Exchange Act of 1934. Lead Plaintiff alleges that Defendants defrauded shareholders by manipulating Symantec’s financial reports to create the illusion of stronger-than-actual financial performance and outlook for fiscal years 2017 and 2018. Among other things, Lead Plaintiff alleges that, while publicly reporting strong financial performance, Defendants improperly reported revenue in violation of Generally Accepted Accounting Principles, and misclassified ordinary operating expenses as “transition costs.” Moreover, the Action alleges that Defendants manipulated financial results to gain lucrative executive compensation bonuses and equity packages. According to Lead Plaintiff, Defendants’ alleged misstatements caused the price of Symantec common stock to be inflated during the Class Period (from May 11, 2017 through August 2, 2018) and to decline when the alleged truth

emerged though corrective disclosures on May 10, 2018 and August 2, 2018, resulting in financial losses to those who purchased the stock at the inflated price. Lead Plaintiff also alleges that Mr. Clark engaged in insider trading by selling shares of Symantec common stock during the Class Period while in possession of material, non-public information. You may review a copy of the operative Complaint in the Action by visiting [www.SymantecSecuritiesLitigation.com](http://www.SymantecSecuritiesLitigation.com).

### **(b) DEFENDANTS' DENIAL OF LIABILITY**

Defendants deny Lead Plaintiff's allegations in full and deny any wrongdoing or liability for the claims alleged. Among other things, Defendants deny that they made any false or misleading statements violating the Securities Exchange Act of 1934, that they knew or believed Symantec's financial reporting was inaccurate, that Symantec's classifications of transition costs were improper, that the company's stock price was artificially inflated during the period from May 11, 2017 through August 2, 2018, that the stock price declines on May 10, 2018 and August 2, 2018 were caused by the disclosure of any wrongdoing or liability on the part of Defendants, or that any member of the Class sustained damages recoverable under the Securities Exchange Act of 1934. Mr. Clark further denies the allegations of insider trading.

### **3. WHO IS A CLASS MEMBER?**

By order dated May 8, 2020, the Court certified the following Class of plaintiffs:

All persons and entities who purchased or otherwise acquired publicly-traded Symantec common stock during the period from May 11, 2017, to August 2, 2018, inclusive (the "Class Period"), and who were damaged thereby (the "Class"). The Class includes all persons or entities who purchased Symantec common stock contemporaneously with sales of Symantec common stock made or caused by Defendant Clark during the Class Period.

Excluded from the Class by definition are:

Defendants; members of the immediate family of Defendant Clark; any person who was an officer or director of Symantec; any firm or entity in which any Defendant has or had a controlling interest; any person who participated in the wrongdoing alleged; Defendants' liability insurance carriers; any affiliates, parents, or subsidiaries of Symantec, all Symantec plans that are covered by ERISA; and the legal representatives, heirs, beneficiaries, successors-in interest, or assigns of any excluded person or entity, in their respective capacity as such.

The ruling by the Court certifying the Class does not address the merits of this litigation. Rather, the certification of the Class means only that the ultimate outcome of the Action—whether favorable or unfavorable to the Class or Defendants—will apply in like manner to each Class Member who does not timely elect to be excluded from the Class.

### **4. WHO REPRESENTS THE CLASS?**

Class Counsel, who represent the Class in this lawsuit, is the law firm Bernstein Litowitz Berger & Grossmann LLP. Class Counsel may be contacted at the address and phone number listed below under Question 7.

### **5. HOW DO YOU PARTICIPATE IN THIS CLASS ACTION?**

If you fall within the definition of the Class set forth above, you are a member of the Class. **IF YOU WISH TO REMAIN A MEMBER OF THE CLASS, YOU DO NOT NEED TO DO ANYTHING AT THIS TIME.** As a Class Member, you will be bound by any judgment or settlement, whether favorable or unfavorable, in this Action. Thus, you may participate in any monetary settlement or judgment rendered in favor of the Class, and you may submit a Proof of Claim following such a settlement or judgment. **No settlement or judgment has occurred at this time. You will necessarily also be bound by any unfavorable judgment which may be rendered in**

**favor of Defendants.** You will not necessarily have the further opportunity to seek exclusion from the Class at the time of any settlement. It is within the Court's discretion whether to allow a second opportunity to request exclusion from the Class if the Action is resolved by a settlement. In other words, this may be your only chance to opt out of the lawsuit.

Lead Plaintiff and Class Counsel represent the Class and all of its members. Class Counsel has agreed to pursue this Action on a contingent-fee basis. All attorney's fees and expenses will be payable only out of a recovery by the Class, if any, and will be subject to approval by the Court. Class Members will not have to pay lawyers any additional amounts, and in no event will individual Class Members be obligated to pay any judgment, court costs, or lawyer's fees for participating in this Action.

Any Class Member who does not request exclusion from the Class may also enter an appearance through his or her own counsel at his or her own expense.

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 members of the Class will recover any money, should there be a recovery, Class Members will be required to submit a Proof of Claim demonstrating their membership in the Class and documenting their sales, purchases, and/or holdings of Symantec common stock, and their resulting damages. ***For this reason, please be sure to keep all records of your transactions and holdings in Symantec common stock. DO NOT mail them to Class Counsel or the Notice Administrator at this time.*** No money or benefits are available now and there is no guarantee that money or benefits will be obtained. If they are, Class Members will be notified regarding how to obtain a share.

## 6. HOW CAN YOU BE EXCLUDED FROM THE CLASS?

If you wish to be excluded from the Class, meaning to opt out of the lawsuit, you must submit a request for exclusion in accordance with the instructions in the next paragraph. **If you choose to be excluded: (1) you will NOT be entitled to share in any recovery from any settlement or judgment that may be paid to members of the Class as a result of a trial or other resolution of this lawsuit; (2) you will NOT be bound by any judgment or release entered in this lawsuit; and (3) at your own expense, you MAY pursue any claims that you have by filing your own lawsuit or taking other action.**

To exclude yourself from the Class, you must send a letter stating that you "request exclusion from the Class in *SEB Investment Management AB v. Symantec Corp.*, Case No. C 18-02902-WHA." Your request must: (i) state the name, address, and telephone number of the person or entity requesting exclusion, and, in the case of entities, the name and telephone number of the appropriate contact person; and (ii) be signed by the person or entity requesting exclusion or an authorized representative, accompanied by proof of authorization. You must mail your exclusion request, ***postmarked by no later than August 25, 2020***, to the Notice Administrator, A.B. Data, Ltd., at the following address:

Symantec Securities Litigation  
EXCLUSIONS  
c/o A.B. Data, Ltd.  
P.O. Box 173001  
Milwaukee, WI 53217

**Only request exclusion if you do NOT wish to participate in the Class Action and do NOT wish to share in any potential recovery that the Class may obtain.**

## 7. HOW CAN YOU GET MORE INFORMATION?

This notice contains only a summary of the litigation and your rights as a potential Class Member. For more detailed information regarding the matters involved in this litigation, please refer to the papers on file in this Action, which may be inspected, during business hours, at the Office of the Clerk of Court, 450 Golden Gate Ave., San

Francisco, CA 94102. In addition, important documents in the case have been posted on the following website: [www.SymantecSecuritiesLitigation.com](http://www.SymantecSecuritiesLitigation.com). Inquiries regarding this litigation may be addressed to the following Class Counsel:

Jeremy P. Robinson, Esq.  
Rebecca E. Boon, Esq.  
**BERNSTEIN LITOWITZ  
BERGER & GROSSMANN LLP**  
1251 Avenue of the Americas  
New York, NY 10020  
1-800-380-8496

#### **8. CHANGE IN YOUR ADDRESS.**

If this notice was mailed to you at an old address, or if you move, please advise the Notice Administrator of your current address so that you can receive any future notice and/or Proof of Claim forms. The Notice Administrator can be reached at *Symantec Securities Litigation*, c/o A.B. Data, Ltd., P.O. Box 173106, Milwaukee, WI 53217. If you are not a member of the Class, you may discard this notice.

#### **9. NOTICE TO BROKERS AND CUSTODIANS.**

If, during the period from May 11, 2017 to August 2, 2018, inclusive, you purchased or otherwise acquired publicly-traded Symantec common stock for the beneficial interest of persons or organizations other than yourself, you must either: (i) within seven (7) calendar days of receipt of this Notice, request from the Notice Administrator sufficient copies of the Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notices forward them to all such beneficial owners; or (ii) within seven (7) calendar days of receipt of this Notice, provide a list of the names and addresses of all such beneficial owners to the Notice Administrator at *Symantec Securities Litigation*, c/o A.B. Data, Ltd., P.O. Box 173106, Milwaukee, WI 53217.

If you choose the first option, you must send a statement to the Administrator confirming that the mailing was made and **you must retain your mailing records for use in connection with any further notices that may be provided in the Action.** If you choose the second option, the Administrator will send a copy of the Notice to the beneficial owners. Upon full and timely compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred by providing the Notice Administrator with proper documentation supporting the expenses for which reimbursement is sought. Copies of this Notice may also be obtained from [www.SymantecSecuritiesLitigation.com](http://www.SymantecSecuritiesLitigation.com), or by calling the Notice Administrator toll free at 1-800-949-0206.

DATED: June 26, 2020.

BY ORDER OF THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA