

Exhibit 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

In re 2U, Inc. Securities Class Action

Consolidated case No. 8:19-cv-03455-TDC

**DECLARATION OF THOMAS J. MINTON IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF SETTLEMENT, FEE AWARD,
AND SERVICE AWARD**

I, Thomas J. Minton, declare and state, under penalty of perjury, that the following is true and correct to the best of my knowledge, information and belief:

1. I am an attorney duly licensed to practice law in Maryland and in the District of Columbia, and before this Court.

2. I am a principal member of Goldman & Minton, P.C. ("G&M), Local Counsel for Plaintiff Fiyyaz Pirani, and have served as Liaison Counsel for Plaintiffs in this litigation (the "Action"). I have personal knowledge of the matters set forth herein and, if called upon, I could and would completely testify thereto.

3. A copy of the G&M résumé is annexed hereto as Exhibit A.

4. G&M has been involved in this Action since it was transferred to this Court from the United States District Court for the Southern District of New York in December 2019.

5. I was the responsible attorney for handling the case at G&M. My involvement was as Local or Liaison Counsel. In that capacity, I reviewed, edited, and filed pleadings and motions, and I advised principal counsel on aspects of Maryland law and the Court's Local Rules as necessary.

6. I am a 1982 graduate of the Georgetown University Law Center. I was admitted to the D.C. Bar in 1983, and to the Maryland Bar in 1985. My hourly rate in complex matters representing shareholders in public companies is consistent with the rates charged by other attorneys of similar seniority and experience in this field in Maryland and D.C. My firm's lodestar

calculation is based on my current billing rate for similar matters. This lodestar does not include time spent in preparing this Declaration, or time related to billing or time reporting..

	Years in Practice	Hourly Rate	Hours Worked	Lodestar
TJM	38	\$650	32.6	\$21,190
Total				

7. From the transfer of this Action to this Court in December 2019, through April, 2022, when we informed the Court of the settlement agreement, I performed a total of 32.6 professional work hours in the prosecution of this Action. The total lodestar amount for my firm is \$21,190.

8. My time in the case can be broken down as follows:
- a. Pleadings: 6.3 hrs.
 - b. Motions: 11.4 hrs.
 - c. Case Management: 12.8 hrs.
 - d. Settlement: 2.1 hrs.

9. G&M also expended a total of \$1,383.16 in un-reimbursed expenses in connection with the prosecution of this Action broken down as follows:

LIST OF UNREIMBURSED CASE EXPENSES

<u>Category</u>	<u>Amount</u>
Telephone and Facsimile	\$
Photocopying/Reproduction	\$
Postage/Messenger/Federal Express	\$ 83.16
Court Filing Fees /Pro Hac Vice filing fees	\$ 1,300.00
Service of Process	\$
Travel	\$
Computer Research/Services	\$
TOTAL:	\$1,383.16

10. The expenses set forth above are reflected in counsel's books and records. These books and records are prepared from expense vouchers, check records, and financial statements prepared in the normal course of business for my firm and are an accurate record of the expenses incurred in the prosecution of this Action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of October 2022.

By: /s/ Thomas J. Minton
Thomas J. Minton – No. 03370

Exhibit A

GOLDMAN & MINTON, P.C.
3600 Clipper Mill Rd. Suite 201
Baltimore, MD 21211
(410) 783-7575

Thomas J. Minton

Thomas J. Minton is a 1978 graduate of Colgate University and a 1982 graduate of the Georgetown University Law Center. Upon graduation from law school, after serving an internship with the President's Task Force on Victims of Crime, Mr. Minton worked at the Georgetown Institute of Criminal Law and Procedure. In 1984, Mr. Minton entered private practice in Baltimore with Quinn, Ward & Kershaw, P.C., where he began his concentration on complex civil litigation, including class actions. Mr. Minton formed his present firm of Goldman & Minton, P.C. with his partner, Kathryn Goldman, in June 2003. Goldman & Minton, P.C. is an AV-rated ® firm that devotes much of its practice to the representation of consumers and investors in complex civil litigation.

Recent Cases

In a case filed on behalf of Maryland auto insurance policyholders, Mr. Minton was lead counsel on a question certified by the U.S. District Court for the District of Maryland to the Maryland Court of Appeals. In that case, *State Farm v. Queen*, the Court of Appeals ruled on July 27, 2020 that State Farm had improperly denied reimbursement of certain categories of property damage to thousands of Maryland policyholders whose claims arose under their Uninsured Motorist coverage. (The case is reported at 469 Md. 674). The case was remanded to federal court where a class was certified for settlement purposes. Final approval was granted on November 19, 2021. (*Queen v. State Farm Mut. Auto. Ins. Co.*, No. 1:18-cv-02625). As a result, over 24,000 Marylanders will share in a settlement fund of approximately \$3.3 million.

Mr. Minton recently represented a group of condominium owners who were sued by a developer claiming that the defendants' public opposition to his latest development plans was both a breach of agreements incorporated into their deeds, and a tortious interference with his business. The suit sought millions of dollars in alleged damages, and included a claim for \$25 million in punitive damages. Mr. Minton argued successfully in the trial court that the suit was an illegal SLAPP suit (Strategic Lawsuit Against Public Participation) under Md. Cts. & Jud. Proc. Code § 5-807. The developer appealed. In an opinion dated December 16, 2021, the Court of Special Appeals affirmed. It is the first opinion by a state appellate court addressing Maryland's anti-SLAPP statute. (253 Md. App. 279, 265 A.3d 1140).

Class and Derivative Suits

Mr. Minton has served as class counsel and counsel for shareholders in dozens of cases in both state and federal courts in Maryland and the District of Columbia, including the following:

White v. NewRez LLC d/b/a Shellpoint Mortgage Servicing, Circuit Court for Anne Arundel County, No. C-02-20-001060 (Md. Comm. Code and Consumer Protection). Mr. Minton served as co-lead counsel for a class of consumer mortgage borrowers who alleged that the servicer charged illegal fees. Final approval of the class action settlement was granted in August 2021.

In re India Globalization Capital, Inc. Derivative Litig., U.S. Dist. Ct. for the District of Maryland No. 1:18-cv-03698 (Shareholder derivative action). Mr. Minton served as liaison counsel. Settlement approved July 6, 2020.

Salley v. Osiris Therapeutics, Inc., U.S. Dist. Ct. for the District of Maryland, No. 1:17-cv-03777 (Shareholder derivative action). Mr. Minton served as liaison counsel. Settlement approved February 1, 2019.

Patton v. Wells Fargo Fin. Md., Inc., Circuit Court for Anne Arundel County no. C-10-149844 (Md. Comm. Code and Consumer Protection); class certified June 15, 2015; Settlement in the amount of \$4.827 million approved July 21, 2017. Mr. Minton was lead counsel. Class certification was granted after a successful appeal reversing the trial court's dismissal of the case. This seminal victory for Maryland consumers under Title 12, Subtitle 10 of the Maryland Commercial Code is published at 437 Md. 83 (2014).

Bennett v. Dunne Wright Svcs., LLC, et al., Circuit Court for Baltimore City, no. 24-C-15-002182 (Tenant rights, Consumer Protection Act); class certified October, 2015. Settlement, including permanent injunctive relief, approved December 29, 2016. Mr. Minton served as co-lead counsel for the class, together with attorneys from the Public Justice Center.

In re Javelin Mortgage Investment Corp. Shareholders Litig., Circuit Court for Baltimore City, no. 24-C-16-001542. (Shareholder derivative action). Case remains pending. Mr. Minton has been appointed Interim Co-Lead Counsel for shareholders by Order dated April 25, 2016.

In re MPG Office Trust, Inc. Preferred Shareholder Litig., Circuit Court for Baltimore City, Lead case no. 24-C-13-004097. Mr. Minton served as liaison counsel for shareholders. Settlement with aggregate cash value to shareholders in excess of \$21 million was approved by order dated October 27, 2015.

Dowridge, et al. v. Sage Management, LLC, Circuit Court for Baltimore City, no. 24-C-14-001223 (Tenant rights, Consumer Protection Act); Settlement, including permanent injunctive relief, approved September 10, 2015. Mr. Minton served as lead counsel for the class.

In re American Capital, Ltd. Derivative Litig., U.S. District Court for the District of Maryland, Lead Case no. 8:11-cv-2424 PJM (Shareholder derivative action). Mr. Minton served as liaison counsel. Settlement approved, August 20, 2013.

Olokun v. Jerry's Chevrolet, Inc., Circuit Court for Baltimore County, Case no.: 03-C-11-001320 (Consumer Protection Act; Fraud); Settlement approved, February 20, 2013. Mr. Minton served as lead counsel for the class.

Buschell-Monk v. O'Malley, Miles, Nylen & Gilmore, P.A., U.S. District Court for the District of Maryland, no. 1:10-cv-302 RDB (Fair Debt Collection Practices Act); Settlement approved, January 25, 2013. Mr. Minton served as lead counsel for the class.

In re Crystal River Capital, Inc. Shareholders Litig., Circuit Court for Baltimore City, Case no.: 24-C-10-001672 (Shareholder derivative action). Mr. Minton served as liaison counsel. Settlement approved, November 20, 2012.

Bailey v. Miller Brothers Chevrolet Oldsmobile Cadillac, Inc., Circuit Court for Howard Co., Case no.: 13-C-10-081759CN (Consumer Protection Act; Fraud); Settlement approved, March 19, 2012. Mr. Minton served as lead counsel for the class.

Goodie v. WFF, P.A., U.S. District Court for the District of Maryland, no. MJG-10-870, (Fair Debt Collection Practices Act); Settlement approved, February 10, 2012. Mr. Minton served as lead counsel for the class.

In re American Community Properties Trust Shareholders Litig., Circuit Court for Charles Co., Case no. C-09-2947 (Securities fraud). Mr. Minton served as liaison counsel. Settlement approved, Oct. 19, 2010

Dale Wells v. Allstate Ins. Co., U.S. District Court for the District of Columbia, no. 1:00 CV007660 LFO (2002) (Consumer Protection Act); Settlement approved, 557 F.Supp.2d 1 (D. D.C. 2008). Mr. Minton served as co-lead counsel for the class.

Eunice Wells v. Chevy Chase Bank, FSB, Circuit Court for Baltimore City, no. 24-C-99-000202 (Consumer Protection Act); Nationwide settlement for \$16.1 million approved in April, 2007. Mr. Minton served as co-lead counsel for the class.

Adams Family Trust v. Capital Automotive REIT, Circuit Court for Baltimore City no.: 24-C-05-08722 (Shareholder derivative action). Mr. Minton served as liaison counsel. Settlement approved, June 27, 2006.

Alexander v. Two Winthrop Properties, Inc., Superior Court for the District of Columbia, no. 00-005602 (2001) (Breach of Contract, Breach of Fiduciary Duty in real estate investment transaction). Mr. Minton served as co-lead counsel for a nationwide class of investors. Settlement in the amount of \$6.9 million approved in September 2004.

Peoples v. Wendover Funding, Inc., 179 F.R.D. 492 (D. Md. 1998) (Federal Fair Debt Collection Practices Act).

Other activities

Mr. Minton served for two years (1992-1994) as chair of the Maryland State Bar Association's Judicial Administration Section (now the Bench-Bar Section).

Mr. Minton served three years on the governing Council of the Tort and Insurance Practice Section of the ABA. From 1997 until 1999, Mr. Minton chaired the Section's Task Force on Class Action Litigation.

From 2001-2003 Mr. Minton was a member of the ABA's Presidential Task Force on Class Action Litigation, representing consumer, insurance policyholder, and public shareholder interests in helping to formulate ABA policy on federal class action procedural reform.

In 1995, the Public Justice Foundation honored Mr. Minton with the national Public Justice Achievement Award for his work as co-lead counsel on behalf of a class of consumers in a RICO class action filed in the United States District Court for the Eastern District of Virginia.

Mr. Minton is rated AV ® by Martindale-Hubbell and has been named a Maryland Super Lawyer in 2011 - 2022.

Mr. Minton is admitted to practice before state and federal courts in Maryland and the District of Columbia, the Fourth Circuit, and the U.S. Supreme Court.