

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

IN RE 2U, INC. SECURITIES CLASS
ACTION

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

**LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES, PAYMENT
OF LITIGATION EXPENSES, AND REIMBURSEMENT TO PLAINTIFFS**

PLEASE TAKE NOTICE that Court-appointed Lead Counsel Pomerantz LLP, together with Labaton Sucharow LLP, will move this Court on December 9, 2022, at 9:30 a.m., before the Honorable Theodore D. Chuang, for entry of an Order, pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(4) (“PSLRA”), awarding: (i) Plaintiffs’ Counsel attorneys’ fees in the amount of 33.4% of the Settlement Amount, plus accrued interest; (ii) Plaintiffs’ Counsel litigation expenses in the amount of \$198,380.16, plus accrued interest; and (iii) reimbursement to Lead Plaintiff Fiyyaz Pirani in the amount of \$30,000 and to Additional Named Plaintiff Oklahoma City Employee Retirement System in the amount of \$5,121.65 for time expended in performing duties on behalf of the Settlement Class, as authorized by the PSLRA.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Lead Counsel submits and is filing herewith: (i) Lead Counsel’s Memorandum of Law in Support of Motion for Award of Attorneys’ Fees, Payment of Litigation Expenses, and Reimbursement to Plaintiffs; and (ii) the Declaration of Jeremy A. Lieberman in Support of (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation of the Net Proceeds of

the Settlement, and (2) Lead Counsel's Motion for an Award of Attorneys' Fees, Payment of Litigation Expenses, and Reimbursement to Plaintiffs, and the exhibits thereto.

A Proposed Order will be submitted with Plaintiffs' reply submission on or before November 25, 2022, after the deadlines for objecting and seeking exclusion have passed.

DATED: October 28, 2022

Respectfully submitted,

POMERANTZ LLP

By: /s/ Jeremy A. Lieberman

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*Counsel for Additional Named Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2022, I caused the foregoing to be electronically filed with the Clerk of Court via CM/ECF, which will send a notice of electronic filing to all registered users.

By: /s/ Jeremy A. Lieberman

Jeremy A. Lieberman