

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

IN RE 2U, INC. SECURITIES CLASS
ACTION

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

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION OF THE
NET PROCEEDS OF THE SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Fiyfaz Pirani (“Pirani” or “Lead Plaintiff”) and Additional Named Plaintiff Oklahoma City Employee Retirement System (“OCERS” or “Additional Named Plaintiff”) (collectively, “Plaintiffs”), on behalf of themselves and all members of the proposed Settlement Class, by and through their undersigned counsel of record, will move this Court on December 9, 2022, at 9:30 a.m., before the Honorable Theodore D. Chuang, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment approving the proposed Settlement as fair, reasonable, and adequate, and for entry of an Order approving the proposed Plan of Allocation for the net proceeds of the Settlement as fair, reasonable, and adequate.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Plaintiffs submit and are filing herewith: (i) Plaintiffs’ Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation of the Net Proceeds of the Settlement; 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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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