

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

*In re Grand Canyon Education, Inc. Securities
Litigation*

Civil Action No. 20-639-JLH-CJB

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Proposed Settlement and Authorizing Dissemination of Notice of Settlement dated May 1, 2024, Lead Plaintiffs Fire and Police Pension Association of Colorado, Oakland County Employees' Retirement System, and Oakland County Voluntary Employees' Beneficiary Association Trust (collectively, "Lead Plaintiffs"), in the above-captioned action respectfully move this Court before the Honorable Christopher J. Burke, on August 22, 2024 at 11:00 a.m. in Courtroom 2A of the J. Caleb Boggs Federal Building and United States Courthouse, 844 North King Street, Wilmington, DE 19801, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate; and entry of an Order approving the proposed Plan of Allocation as fair, reasonable and adequate.

Lead Plaintiffs' motion is supported by (a) the Joint Declaration of Jeffrey W. Golan and Katherine M. Sinderson in Support of: (1) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (2) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (c) all other papers and proceedings herein. A final proposed Judgment and a proposed Order approving the proposed

Plan of Allocation will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: July 18, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2024, I caused Lead Plaintiffs' Motion for Final Approval of Proposed Class Settlement and Plan of Allocation to be filed and submitted electronically, served via email on all counsel of record, and to be made available for viewing and downloading from the CM/ECF system.

/s/ Gregory V. Varallo
Gregory V. Varallo