

**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 COUNSEL’S MOTION FOR  
ATTORNEYS’ FEES AND LITIGATION EXPENSES**

Pursuant to Federal Rule of Civil Procedure 23(h) and this Court’s Order Preliminarily Approving Proposed Settlement and Authorizing Dissemination of Notice of Settlement dated May 1, 2024, Lead Counsel 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 an Order awarding attorneys’ fees and Litigation Expenses, including reimbursement of Lead Plaintiffs’ costs pursuant to 15 U.S.C. §78u-4(a)(4).

Lead Counsel’s 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 Counsel’s Motion for Attorneys’ Fees and Litigation Expenses; and (c) all other papers and proceedings herein. A proposed Order granting the relief requested will be submitted with Lead Counsel’s reply papers after the deadline for objecting to the motion has passed.

Dated: July 18, 2024

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Hannah G. Ross  
Katherine M. Sinderson (*pro hac vice*)  
Robert F. Kravetz (*pro hac vice*)  
Michael M. Mathai (*pro hac vice*)  
Sarah Schmidt  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444  
hannah@blbglaw.com  
katiem@blbglaw.com  
robert.kravetz@blbglaw.com  
michael.mathai@blbglaw.com  
sarah.schmidt@blbglaw.com

**BARRACK, RODOS & BACINE**

Jeffrey W. Golan (*pro hac vice*)  
Chad A. Carder (*pro hac vice*)  
Jordan R. Laporta  
3300 Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 963-0600  
Facsimile: (215) 963-0838  
jgolan@barrack.com  
rhoffman@barrack.com  
ccarder@barrack.com  
jlaporta@barrack.com

*Counsel for Lead Plaintiffs  
and Lead Counsel for the Settlement Class*

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ Gregory V. Varallo  
Gregory V. Varallo (Bar No. 2242)  
500 Delaware Avenue, Suite 901  
Wilmington, DE 19801  
Telephone: (302) 364-3601  
greg.varallo@blbglaw.com

*Counsel for Lead Plaintiffs  
and Lead Counsel for the Settlement Class*

**VANOVERBEKE, MICHAUD  
& TIMMONY, P.C.**

Aaron L. Castle (*pro hac vice*)  
79 Alfred Street  
Detroit, MI 48201  
Telephone: (313) 578-1200  
Facsimile: (313) 578-1201  
acastle@vmtlaw.com

*Additional Counsel for Lead Plaintiffs  
Oakland County Employees' Retirement  
System and Oakland County Voluntary  
Employees' Beneficiary Association Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2024, I caused Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses 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