

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS TEACHER RETIREMENT SYSTEM
and FRESNO COUNTY EMPLOYEES'
RETIREMENT ASSOCIATION, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BANKRATE, INC. et al.,

Defendants.

Case No. 13-cv-7183 (JSR)

ECF CASE

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR (I) PRELIMINARY APPROVAL OF
SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT CLASS AND
(III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated August 5, 2014, attached hereto as Exhibit 1; the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiffs Arkansas Teacher Retirement System and Fresno County Employees' Retirement Association ("Lead Plaintiffs") hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Settlement Class and appointing Lead Plaintiffs as class representatives and Lead Counsel as class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iv) scheduling a hearing on final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses. Attached hereto as Exhibit 2 is the proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice and its exhibits.

Dated: August 6, 2014
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ John J. Rizio-Hamilton

Salvatore J. Graziano

John J. Rizio-Hamilton

1285 Avenue of the Americas, 38th Floor

New York, NY 10019

Tel: (212) 554-1400

Fax: (212) 554-1444

*Attorneys for Lead Plaintiffs Arkansas Teacher
Retirement System and Fresno County
Employees' Retirement Association*

#822008