

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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PATRICK MCDERMID, individually and on behalf of all others similarly situated,	)	Case No. 2:20-cv-01402-GJP
	)	
Plaintiff,	)	Judge Gerald J. Pappert
	)	
v.	)	<u>CLASS ACTION</u>
	)	
INOVIO PHARMACEUTICALS, INC., and J. JOSEPH KIM,	)	
	)	
Defendants.	)	
	)	

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**MOTION OF THANH VO FOR APPOINTMENT AS LEAD  
PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL**

Proposed Lead Plaintiff Thanh Vo (“Vo”), respectfully moves the Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (1) appointing Vo as Lead Plaintiff; (2) approving Vo’s selection of Thornton Law Firm LLP as Lead Counsel for the Class and Goldman Scarlato & Penny, P.C. as Liaison Counsel for the Class; and (3) granting such other relief as the Court deems just and proper.

This motion is made on the grounds that Vo believes he is the “most adequate plaintiff” under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Vo believes that he has the “largest financial interest” in the relief sought by the Class in this litigation. Vo also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because his claims are typical of other Class members’ claims and because he will fairly and adequately represent the interests of the Class.

Vo respectfully requests oral argument.

This Motion is based upon the accompanying Memorandum of Law in support hereof, the Declaration of Mark Goldman filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Vo respectfully requests that the Court enter an Order: (1) appointing Vo as Lead Plaintiff; (2) approving Vo’s selection of Thornton Law Firm LLP as Lead Counsel for the Class and Goldman Scarlato & Penny P.C. as Liaison Counsel for the Class; and (3) granting such other relief as the Court deems just and proper.

Dated: May 12, 2020

Respectfully submitted,

By: /s/ Mark S. Goldman  
Mark S. Goldman (PA ID No. 48049)  
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