

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

PATRICK MCDERMID, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

INOVIO PHARMACEUTICALS, INC., and J.  
JOSEPH KIM,

Defendants.

Civil Action No. 2:20-cv-1402-GJP

**NOTICE OF MOTION OF THE INOVIO INVESTOR GROUP FOR APPOINTMENT  
AS LEAD PLAINTIFFS AND APPROVAL OF SELECTION OF COUNSEL**

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**NOTICE IS HEREBY GIVEN THAT** that Proposed Lead Plaintiffs Sal Isabella, the Sal Isabella Retirement Plan, and Hao Cui (together, “Movants” or the “Inovio Investor Group”) will move this Court, before the Honorable Gerald J. Pappert, United States District Judge, on such date as the Court will determine, in the James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106, for an order: (1) appointing the Inovio Investor Group as Lead Plaintiffs in the above-captioned action pursuant to the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995; (2) approving Movants’ selection of Wolf Haldenstein Adler Freeman & Herz LLP to serve as Lead Counsel to the Class in the above-captioned action; and (3) granting such other relief as the Court deems appropriate.

This Motion is supported by the accompanying Memorandum of Law; the accompanying declaration of Mark C. Rifkin and the exhibits attached thereto; the pleadings herein; and any such other written and/or oral argument, as may be presented to the Court.

Dated: May 12, 2020

**WOLF HALDENSTEIN ADLER**

**FREEMAN & HERZ LLP**

By: /s/ Mark C. Rifkin

Mark C. Rifkin (MR-0904)

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*Counsel for the Inovio Investor Group and  
Proposed Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 12, 2020, I electronically filed the foregoing and all related documents with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Mark C. Rifkin