

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

PATRICK MCDERMID, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

INOVIO PHARMACETICALS, INC, and  
J. JOSEPH KIM,

Defendants.

Case No. 2:20-cv-01402-GJP

**NOTICE OF JOSHUA FARAZDEL'S MOTION FOR APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Joshua Farazdel (“Movant”) respectfully moves this Court for an order: (1) appointing Movant as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Movant’s selection of Glancy Prongay & Murray LLP as Lead Counsel for the class; and (3) granting such other relief as the Court may deem to be just and proper (the “Motion”).

Movant seeks consolidation of actions, appointment as lead plaintiff, and approval of his choice of counsel pursuant to the Exchange Act, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached memorandum of law, the declaration of Lee Albert, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Respectfully submitted,

DATED: May 12, 2020

**GLANCY PRONGAY & MURRAY LLP**

By: /s/ Lee Albert  
Lee Albert (PA No. 46852)  
230 Park Ave., Suite 530  
New York, NY 10169  
Telephone: (212) 682-5340  
Facsimile: (212) 884-0988  
lalbert@glancylaw.com

-and-

**GLANCY PRONGAY & MURRAY LLP**

Robert V. Prongay

Charles H. Linehan

Pavithra Rajesh

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

Telephone: (310) 201-9150

Facsimile: (310) 201-9160

*Counsel for Movant and Proposed Lead Counsel  
for the Class*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On May 12, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of Pennsylvania, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 12, 2020, at New York, New York.

/s/ Lee Albert  
Lee Albert