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[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

*In re Iovance Biotherapeutics, Inc. Securities
Litigation*

Case No.: 5:25-cv-04177-EKL

JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
CASE SCHEDULE

Judge: Hon. Eumi K. Lee
Courtroom: 7 – 4th Floor

1 Court appointed Lead Plaintiff Lindy Merrill and Tony Djie (“Plaintiff”) and Defendants
 2 Iovance Biotherapeutics, Inc., Frederick G. Vogt, Jean-Marc Bellemin, Igor Bilinsky, and Daniel G.
 3 Kirby (collectively, “Defendants”), by and through their respective counsel, respectfully submit this
 4 Stipulation and [Proposed] Order setting forth a schedule for the filing of an amended complaint, a
 5 motion to dismiss, an opposition to the motion to dismiss, and a reply to the opposition to the motion
 6 to dismiss.

7 **WHEREAS**, on December 15, 2025, the Court entered an Order Appointing Lead Plaintiff
 8 and Lead Counsel which requires the parties to submit a proposed schedule for the filing of a
 9 consolidated or amended complaint and Defendants’ responsive pleading within thirty days [Docket
 10 No. 92];

1 **WHEREAS**, Plaintiff presently intends to file an amended complaint;

13 **WHEREAS**, the Defendants presently intend to move to dismiss any complaint in this action;

14 **WHEREAS**, pursuant to the PSLRA, all discovery and other proceedings in this action are
 15 stayed pending the determination of the Defendants’ planned motion to dismiss;

16 **NOW, THEREFORE**, Plaintiff and the Defendants stipulate and agree, subject to approval
 17 of the Court, as follows:

- 18 1. Plaintiff shall file an amended complaint (the “CAC”) by March 16, 2026;
- 19 2. The Defendants shall answer or otherwise respond to the CAC by May 15,
 20 2026;
- 21 3. If a motion to dismiss is filed, Plaintiff shall file any opposition by July 14,
 22 2026;
- 23 4. The Defendants shall file any reply by August 13, 2026.

24 Dated: January 14, 2026

25 **THE ROSEN LAW FIRM, P.A.**
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By: /s/ Sara Fuks
Sara Fuks

Lead Counsel for Lead Plaintiff and the Class

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Dated: January 14, 2026

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By: /s/ Tommy Huynh

*Counsel for Defendants Iovance
Biotherapeutics, Inc., Frederick Vogt, Jean-
Marc Bellemin, Igor P. Bilinsky, and Daniel G.
Kirby*

SIGNATURE ATTESTATION

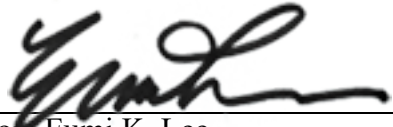
Pursuant to Local Civil Rule 5-1(h)(3), I attest under penalty of perjury that each of the other signatories have concurred in the filing of this document.

January 14, 2026

By: /s/ Sara Fuks
Sara Fuks

IT IS SO ORDERED

Dated: January 20, 2026


Hon. Eumi K. Lee
United States District Court Judge