

A federal court has authorized this notice. This is not a solicitation from a lawyer.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

KEVIN KENDALL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ODONATE THERAPEUTICS, INC., KEVIN
C. TANG, MICHAEL HEARNE, and JOHN
G. LEMKEY,

Defendants.

Case No. 3:20-cv-1828-H-LL

Class Action

NOTICE OF PENDENCY OF CLASS ACTION

PLEASE READ THIS NOTICE CAREFULLY.

IF YOU PURCHASED OR OTHERWISE ACQUIRED THE STOCK OF ODONATE THERAPEUTICS, INC. (“ODONATE”) (NASDAQ: ODT) BETWEEN DECEMBER 7, 2017 AND MARCH 25, 2021, BOTH DATES INCLUSIVE, YOUR RIGHTS MAY BE AFFECTED BY THIS CASE.

YOU ARE HEREBY NOTIFIED that a proposed settlement (the “Settlement”) has been reached in this action (the “Class Action” or “Action”). A hearing will be held on June 6, 2022, at 10:30 a.m., before the Honorable Marilyn L. Huff, United States District Judge, at the courthouse for the United States District Court, Southern District of California, James M. Carter and Judith N. Keep United States Courthouse, 333 West Broadway, San Diego, CA 92101.

The purpose of the hearing is to determine, among other things: (1) whether the proposed Settlement of the Action against the Defendants Odonate, Kevin C. Tang, Michael Hearne, and John G. Lemkey for total gross settlement consideration of twelve million seven hundred fifty thousand dollars (\$12,750,000.00) (the “Settlement Fund”) should be approved as fair, reasonable and adequate; (2) whether the Plan of Allocation is fair and reasonable and should be approved; (3) whether Lead Plaintiff’s application for reimbursement of expenses not to exceed one hundred thousand dollars (\$100,000.00), Lead Plaintiff’s request for a compensatory award in the amount of five thousand dollars (\$5,000.00), and Co-Lead Counsel’s application for an award of attorneys’ fees not to exceed one third (33 1/3%) of the gross Settlement Fund, all to be paid from the Settlement Fund, should be granted; and (4) whether the Action should be dismissed with prejudice against the Defendants as set forth in the Stipulation of Settlement (the “Stipulation”) filed with the Court.

Why Am I Receiving this Notice?

This Notice is issued pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of California (the “Court”), entered January 18, 2022. The Court has certified a class of investors for settlement purposes only (the “Settlement Class” or “Class”). You are receiving this Notice because you may be a member of the Settlement Class (a “Settlement Class Member”). If you are a Settlement Class Member, your rights will be affected by this lawsuit. The purpose of this Notice

is to inform you of: (a) the existence of this Class Action; (b) the certification of the Settlement Class; and (c) your right to be excluded from the Settlement Class. If you do not fall within the Settlement Class described below, this Notice does not apply to you.

Who Is a Class Member?

The Settlement Class will consist of all persons or entities that purchased or otherwise acquired the stock of Odonate (NASDAQ: ODT) between December 7, 2017 and March 25, 2021, both dates inclusive (the “Settlement Class Period”). The Settlement Class excludes the Defendants; members of their immediate families and their affiliates; any entity in which any Defendant had a controlling interest during the Settlement Class Period; any person who served as an officer or director of Odonate during the Settlement Class Period; the judges presiding over the Action and the immediate family members of such judges; any persons or entities listed on the Settlement Exclusion List (as defined in the Stipulation); and the successors, heirs, and assigns of any excluded person. Additional details are listed within the long-form Notice, which can be obtained as described below.

Overview And Status Of The Class Action, Co-Lead Counsel

The case has been litigated since September 16, 2020. Lead Plaintiff alleges that, in violation of the U.S. federal securities laws, Defendants made material misrepresentations and omissions, with scienter, concerning Odonate’s clinical trials & business operations, reported results, and internal controls causing Odonate’s stock price to be inflated during the Settlement Class Period. Lead Plaintiff further alleges that revelation of Defendants’ fraud caused a statistically significant stock decline, thereby injuring Lead Plaintiff and the Settlement Class of investors. Defendants have denied and continue to deny these allegations and deny that they committed any act or omission giving rise to any liability or violation of the law. Lead Plaintiff and the Settlement Class are represented by Co-Lead Counsel in the Class Action: Matthew L. Tuccillo, Pomerantz LLP, 600 Third Avenue, 20th Floor, New York, NY 10016, (212) 661-1100 and/or Corey D. Holzer, Holzer & Holzer, LLC, 211 Perimeter Center Parkway, Suite 1010, Atlanta, GA 30346, (770) 392-0090.

HOW YOU CAN LEARN MORE ABOUT YOUR RIGHTS

If you purchased or otherwise acquired Odonate stock during the Settlement Class Period, your rights may be affected by this Action and the Settlement thereof. You may obtain the Stipulation; the detailed long-form Notice of Proposed Settlement of Class Action, Motion For Attorneys’ Fees and Expenses, and Settlement Fairness Hearing; and the Proof of Claim and Release Form (the “Proof of Claim”) free of charge from the Claims Administrator.

The Notice, Stipulation of Settlement, and Proof of Claim form can be accessed and downloaded from the Claims Administrator’s website at www.strategicclaims.net/odonate/.

HOW YOU CAN EXERCISE YOUR RIGHTS

If you are a member of the Settlement Class and wish to share in the Settlement proceeds, you must submit a valid Proof of Claim, with supporting documentation, received no later than May 2, 2022, establishing that you are entitled to recovery.

You will be bound by any Judgment entered in the Action, regardless of whether you submit a Proof of Claim, unless you exclude yourself from the Class, in accordance with the procedures set forth in the long-form Notice, received no later than May 2, 2022. If you decide to exclude yourself from the Settlement Class and wish to file your own individual lawsuit based on the Released Settlement Class Claims, Defendants in the future may argue that you face a time bar under applicable statutes of limitation or repose, risks that you should discuss with an appropriate legal advisor.

If you do not exclude yourself, you can opt to object to the settlement, the Plan of Allocation, Co-Lead Counsel's request for an award of attorneys' fees and reimbursement of expenses, or Lead Plaintiff's request for a compensatory award in the manner and form explained in the long-form Notice. Any such objections must be filed and served, in accordance with the procedures set forth in the long-form Notice, received no later than May 2, 2022.

The Claims Administrator

The Claims Administrator hired by Co-Lead Counsel to administer the Settlement is Strategic Claims Services. If you are unable to download the Stipulation, long-form Notice, and Proof of Claim via the Claims Administrator's website, as described above, you may contact the Claims Administrator to obtain copies.

Kendall v. Odonate Therapeutics, Inc.
c/o Strategic Claims Services
600 North Jackson Street, Suite 205
Media, PA 19063
Tel: 866-274-4004
Email: info@strategicclaims.net
Website: www.strategicclaims.net/odonate/

Notice To Banks, Brokers And Other Nominees

The Court has ordered that, if, for the beneficial interest of any other person, you held any Odonate stock that was purchased during the Settlement Class Period, then, within ten (10) days after you receive this Notice, you must either:

- (A) provide a list of the names and addresses and email addresses of such beneficial owners to the Claims Administrator, preferably in an MS Excel data file, or printed on physical mailing labels; or
- (B) request sufficient copies of this Notice to send copies to all such beneficial owners, send such Notices by first class mail within ten (10) days after receipt of such copies, and confirm in writing to the Claims Administrator that such notice has been sent. If you elect this option, you must also retain your mailing records for use in connection with any further notices that may be provided in this Class Action.

Under either option, upon full and timely compliance and submission of appropriate documentation to the Claims Administrator, per the contact information set forth above, you may obtain reimbursement for the actual administrative costs reasonably incurred in complying with the obligations above, up to 0.10 plus postage at the current pre-sort rate used by the Claims Administrator per notice mailed; \$0.05 per notice transmitted by email; or \$0.05 per name, mailing address, and email address provided to the Claims Administrator, which expenses would not have been incurred except for the sending of such notice, and subject to further order of the Court with respect to any dispute concerning such reimbursement.

Please Retain Your Records And Keep Your Address Current

Settlement Class Members seeking payment pursuant to the Settlement will be required to document their trades in Odonate stock during the Settlement Class Period. *For this reason, please be sure to keep all records of your transactions in these securities.*

To ensure you receive any further notices, please inform the Claims Administrator of any address change. If this Notice was not sent to your current address, please provide it to the Claims Administrator now.

Dated: January 18, 2022

By Order of the Court
United States District Court, Southern District of California

PLEASE NOTE: INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE CLERK'S OFFICE, THE DEFENDANTS, OR DEFENDANTS' COUNSEL.

Kendall v. Odonate Therapeutics, Inc.
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD