

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: VALE S.A. SECURITIES  
LITIGATION

Case No. 15 Civ. 09539 (GHW)

Consolidated with Case No. 16 Civ. 00658  
(GHW)

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated February 22, 2020, Lead Plaintiffs Alameda County Employees' Retirement Association and Orange County Employees Retirement System ("Lead Plaintiffs"), on behalf of themselves and the Settlement Class, will and do hereby move this Court, before the Honorable Gregory H. Woods, on June 10, 2020 at 4:00 p.m. Eastern time, at a hearing to be held telephonically, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair, reasonable, and adequate. This motion is based on (a) the Declaration of Richard D. Gluck in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (c) all other papers and proceedings herein. A proposed Judgment and an Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers

after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: May 6, 2020

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

*/s/ John C. Browne*

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