

**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)

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA
REGARDING: (A) MAILING OF THE NOTICE AND CLAIM FORM
AND (B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Luiggy Segura, declare as follows:

1. I am a Director at JND Legal Administration (“JND”). Pursuant to the Court’s February 22, 2020 Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement (ECF No. 192) (the “Preliminary Approval Order”), JND was authorized to act as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”).¹ I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date, dated May 5, 2020 (ECF No. 201-3) (the “Initial Mailing Declaration”). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement dated February 5, 2020 (ECF No. 183-1), as amended on February 20, 2020 (ECF No. 188-2) (as amended, the “Stipulation”).

CONTINUED MAILING OF THE NOTICE PACKET

2. Since the execution of my Initial Mailing Declaration, JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional requests from potential Settlement Class Members and nominees. Through June 2, 2020, JND has mailed a total of 231,523 Notice Packets to potential Settlement Class Members and nominees.

TELEPHONE HELPLINE AND WEBSITE

3. JND continues to maintain the toll-free telephone number (1-855-961-0960) and interactive voice response system to accommodate any inquiries from potential members of the Settlement Class. JND also continues to maintain the dedicated website for the Action (www.ValeSecuritiesLitigation.com) in order to assist Settlement Class Members. On May 7, 2020, JND posted to the website copies of the papers filed in support of Lead Plaintiffs’ motion for final approval of the Settlement and Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and expenses. JND will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

4. The Notice informed potential members of the Settlement Class that requests for exclusion from the Settlement Class were to be mailed or otherwise delivered, addressed to *In re Vale S.A. Securities Litigation*, EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91315, Seattle, WA 98111, such that they were received by no later than May 20, 2020. JND has been monitoring all mail delivered to that post office box. As of the date of this Declaration, JND has received a total of twelve (12) requests for exclusion. Of these requests, ten (10) were received before the May 20, 2020 deadline. The eleventh request (from Michael Osuszek) was postmarked

on May 7, 2020 and received by JND on May 22, 2020 and the twelfth request (from Ferry Mulyadi) was emailed to JND on May 26, 2020. Exhibit 1 hereto lists the names of the persons who have requested exclusion from the Settlement Class and their city and state.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of June 2020, at New Hyde Park.



LUIGGY SEGURA

Exhibit 1

1. Larry A. Henrikson
Shelton, CT
2. Lynel Lindmark
Hinkley, MN
3. Heather Trumble
New Orleans, LA
4. Robert Bond
Windsor, ON CANADA
5. William S. Miller
Aneta, ND
6. Wiley H. Turner, M.D.
Edgefield, SC
7. Mary Sevulyan on behalf of
Vagharshak Sevulyan
Cortlandt Manor, NY
8. Warren Poe and
Deborah Poe
Austin, TX
9. John Meier
Norfolk, NE
10. Kevin Wang and
Chen Chen Li
Markham, ON CANADA
11. Michael Osuszek
Toronto, ON CANADA
12. Ferry Mulyadi
SINGAPORE