

**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 COUNSEL'S MOTION FOR  
AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated February 22, 2020, Lead Counsel will and does 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 an Order awarding attorneys' fees and litigation expenses. The 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 Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; and (c) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: May 6, 2020

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

*/s/ John C. Browne*

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John C. Browne  
Gerald H. Silk  
Avi Josefson  
1251 Avenue of the Americas, 44th Fl.  
New York, NY 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444  
johnb@blbglaw.com  
jerry@blbglaw.com  
avi@blbglaw.com

-and-

Richard D. Gluck (*Pro hac vice*)  
12481 High Bluff Drive, Suite 300  
San Diego, CA 92130  
Telephone: (858) 793-0070  
Facsimile: (858) 793-0323  
Rich.Gluck@blbglaw.com

*Counsel for Lead Plaintiffs and Lead  
Counsel for the Settlement Class*

#1380220