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September 10, 2020

VIA ECF

The Honorable Vernon S. Broderick  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, New York 10007  
BroderickNYSDCChambers@nysd.uscourts.gov

Re: *Vale S.A. v. BSG Resources Limited*, No. 19-cv-3619

Dear Judge Broderick:

We collectively write on behalf of Petitioner Vale S.A. (“Vale”), William Callewaert and Malcolm Cohen in their capacity as former joint administrators (together, “Former Joint Administrators”) for BSG Resources Limited (in administration) (“BSGR”), and Richard Fleming, Mark Firmin and Carl Bowles in their capacity as joint administrators for BSGR (collectively, “New Joint Administrators”) to provide the Court with an update regarding recent developments in proceedings before the Guernsey court and its impact on the pending discovery dispute before Your Honor (*see* ECF Nos. 52, 53, 54, 55, 57).

On September 8, 2020, the Guernsey court discharged the Former Joint Administrators, and appointed the New Joint Administrators. As a result, Vale has agreed to a 30-day extension to allow the New Joint Administrators an opportunity to get up to speed on the outstanding discovery requests. Vale and the New Joint Administrators are optimistic that they will be able to resolve any disputes without requiring the Court’s further involvement.

In light of these developments, the parties seek guidance as to whether the Court wishes to adjourn the telephonic conference scheduled for September 14, 2020 at 11:00 a.m., or to proceed as scheduled. We respectfully request that the Court adjourn the telephonic

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conference, and the parties will update the Court as to where things stand on or about October 14, 2020.

Thank you for Your Honor's consideration.

Respectfully submitted,

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