

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

In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings

No. 20-MC-199 (JGK) (OTW)

**PROPOSED ORDER FOR
SUBSTITUTION OF COUNSEL**

Pursuant to Local Civil Rule 1.4 and the accompanying Declaration of Robert J. Cleary, Respondents Perfectus Real Estate Corp. and Tarpley Belnord Corp. (collectively, “Perfectus”) respectfully request that Joseph Z. Hellerstein of Hellerstein & Co. with law offices at 11 Naftali Street, Suite 6, Modin, Israel, be substituted in place and in the stead of the law firm of Proskauer Rose LLP, with offices at Eleven Times Square, New York, New York 10036, as counsel of record for Perfectus in the above-captioned matter. This substitution is made with the knowledge and consent of Perfectus.

Dated: April 21, 2021

Hellerstein & Co.

Joseph Z. Hellerstein

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*Incoming Counsel for Respondents Perfectus
Real Estate Corp. and Tarpley Belnord Corp.*

*Outgoing Counsel for Perfectus Real Estate
Corp. and Tarpley Belnord Corp.*

SO ORDERED THIS 26th DAY OF APRIL 2021.

Hon. Ona T. Wang
United States Magistrate Judge