

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED, AND IN THE MATTER OF A PLAN OF
COMPRISE OR ARRANGEMENT OF SINO-FOREST CORPORATION**

**WRITTEN SUBMISSIONS OF THE
AD HOC COMMITTEE OF PURCHASERS OF THE APPLICANT'S
SECURITIES**

(MOTION RETURNABLE DECEMBER 7 AND 10, 2012)

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Securities, including the
Representative Plaintiffs in the
Ontario Class Action**

TO: SERVICE LIST ATTACHED AS SCHEDULE "A"

1. The Ad Hoc Committee of Purchasers of the Applicant's Securities, including the plaintiffs in the Class Action commenced in the Ontario Superior Court of Justice bearing court file no. CV-11-431153-00CP (the "Class Action Plaintiffs") does not oppose the motion brought by Sino-Forest Corporation ("Sino-Forest") for an order sanctioning its Plan of Compromise and Restructuring (as amended) (the "Plan").

2. In the event that this Court approves the Plan, the Class Action Plaintiffs propose to return to court to seek approval of the settlement agreement with Ernst & Young LLP ("E&Y"), referenced in Article 11 of the Plan, together with corollary relief, and to address remaining issues related to the stay of proceedings against third parties.

3. Sino-Forest is a disaster in which billions of dollars have been lost. These CCAA proceedings were commenced for the purpose of fashioning a solution to the debacle, and for the past eight months, a wide array of stakeholders having a material interest in the outcome of these proceedings have been actively involved in complex and difficult negotiations, at considerable cost. An acceptable solution has now been presented.

4. Relatively early on in the process, it was determined that the market was unwilling to pay anything approaching Sino-Forest's outstanding bond-debt for Sino-Forest's assets. With that established, stakeholders' attention focused on the negotiation of a Plan premised on three core principles or objectives:

(a) Sino-Forest's assets would be transferred to a new company owned by Sino-Forest's creditors;

(b) a litigation trust would be established to pursue various claims of Sino-Forest and/or its creditors against third parties;

(c) shareholder and former noteholder claims against third parties, and the third parties' corresponding indemnity claims would be treated in a fair and balanced manner.

5. The Class Action Plaintiffs have been actively involved throughout these proceedings for the purpose of protecting and furthering the interests of the class members whom they would represent (the "Class"), particularly with respect to the third objective described above. To that end, and among other things, the Class Action Plaintiffs:

(a) attended at the initial hearing, and made submissions that were accepted by the court regarding the sale process order;

(b) attended at the comeback date, and returned a motion on that date that clearly set forth a number of issues with respect to these proceedings, and reserved all rights with respect to those issues;

(c) negotiated tolling agreements to prevent the erosion of Class' rights through the passage of time, while these proceedings unfolded;

- (d) implemented a settlement with Pöyry (Beijing) Consulting Company Limited, and thereby obtained material disclosure regarding the operations of Sino-Forest to assist the Class in the ongoing negotiations;
- (e) obtained representative standing in these proceedings for the purpose of the Claims Procedure approved by this court, and filed a proof of claim on behalf of the Class;
- (f) compelled production of non-public documents by Sino-Forest so as to permit the Class Action Plaintiffs to negotiate with other stakeholders in these proceedings on an informed basis;
- (g) hired and consulted extensively with accounting and damages experts, Chinese and Suriname legal experts, and investigators in Hong Kong and Mainland China;
- (h) examined various insurance policies and assessed the capacity to pay of various defendants, including E&Y;
- (i) tested the evidence of Sino-Forest's representative in these proceedings through cross-examination;
- (j) engaged in multiple formal and informal, group and individual mediation and negotiation sessions with other stakeholders regarding the Class' claims; and,

(k) negotiated the terms of the Plan with Sino-Forest and with other stakeholders, brought a motion challenging various features of the Plan, and expressly reserved the Class Action Plaintiffs' rights in connection with that motion.

6. As a result of the foregoing efforts, and as has been widely reported, the Class Action Plaintiffs reached a settlement late last week, subject to court approval, pursuant to which E&Y will pay \$117,000,000, in settlement of all claims against it in respect its dealings with Sino-Forest (the "E&Y Settlement").

7. The E&Y Settlement, in turn, formed the basis of further negotiations in respect of the Plan, and has allowed the Plan to proceed with little, if any, opposition from the participants in these proceedings.

8. For their part, based upon their very extensive involvement in these proceedings, the Class Action Plaintiffs are satisfied that the Plan, as amended, deals with shareholder and former noteholder claims against third parties in a fair and balanced manner. In particular, the Plan:

(a) leaves the Class' claims against various directors and officers whose conduct has been impugned by the Ontario Securities Commission, including Allen Chan, Kai Kit Poon and David Horsley, wholly unaffected;

(b) preserves claims against Sino-Forest and its other current and former directors and officers to the extent of insurance, and does not affect claims in respect of various intentional torts (fraud, conspiracy, etc.);

(c) offers former noteholders an opportunity to participate in the Litigation Trust created by the Plan in exchange for their agreement to reasonably limit their claims against certain third parties; and,

(d) facilitates the resolution of outstanding litigation, while giving the Ontario Class Action Plaintiffs the ability to prevent the release of claims against third parties, through these proceedings, other than on terms that they believe to be in the interests of the Class.

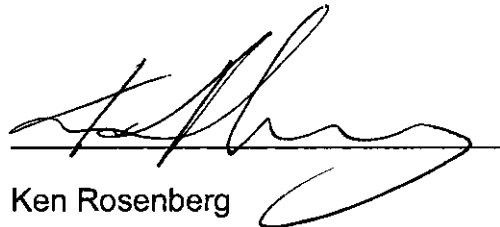
9. In these circumstances, the Class Action Plaintiffs do not oppose the Plan, and, subject to sanction of the Plan in its current form, agree to withdraw their pending motion seeking relief in respect of the Plan on a without costs basis.

10. Conversely, the Class Action Plaintiffs are concerned that if the Plan, which was very heavily negotiated, is not approved in its current form, then further litigation will ensue between the noteholders, auditors, underwriters and others (including, possibly, the Class Action Plaintiffs). This will almost certainly undermine the E&Y Settlement before the court has even had an opportunity to consider its merits.

11. The E&Y Settlement was itself heavily negotiated. As has been widely reported, it is the largest of its kind in Canadian history, and the Class Action Plaintiffs are very firmly of the view that it is a fair and reasonable settlement that merits consideration by this court. To reject the Plan and thereby preclude the E&Y Settlement from ever coming before this court for consideration would only serve to add tragedy to disaster.

12. The Class Action Plaintiffs submit that this court should sanction the Plan, and set a future date for consideration of the E&Y Settlement, together with corollary relief. The Class Action Plaintiffs would also seek to address issues related to the stay of proceedings against third parties at that time.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 6th day of December, 2012.

A handwritten signature in black ink, appearing to read 'Ken Rosenberg', is written over a horizontal line. The signature is fluid and cursive.

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Plaintiffs in the Ontario Class Action**

SCHEDULE "A"

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SUPERIOR COURT OF JUSTICE
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**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 1985, c. c-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
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