

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 COMPROMISE OR
ARRANGEMENT OF SINO-FOREST CORPORATION

SUPPLEMENTARY MOTION RECORD

(Motion to Expand Monitor Powers, Returnable April 20, 2012)

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Tab 1

Court File No. CV-12-9667-00CL

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CORPORATION**

**AFFIDAVIT OF W. JUDSON MARTIN
(Sworn April 20, 2012 in support of a Motion to
Expand Monitor's Powers, Returnable April 20, 2012)**

I, **W. JUDSON MARTIN**, of the City of Hong Kong, Special Administrative Region, People's Republic of China, **MAKE OATH AND SAY:**

1. I am the Vice-Chairman and Chief Executive Officer of Sino-Forest Corporation ("SFC"). I therefore have personal knowledge of the matters set out below, except where otherwise stated. Where I do not possess personal knowledge, I have stated the source of my information and I believe such information to be true.

2. Capitalized terms not defined in this affidavit are as defined in my affidavits sworn March 30, 2012 and April 18, 2012.

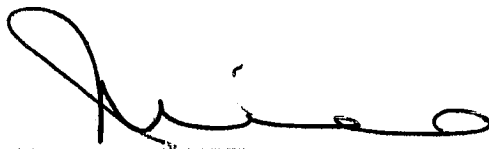
3. I have made further enquiries with counsel about whether the relief sought by the class plaintiffs could be complied with, even in part. In particular, counsel has contacted key individuals at Sino-Forest, its corporate counsel, and Broadridge, and counsel has provided me with the following additional information.

4. The mailing that was last conducted with a record date of April 29, 2011, was not conducted by Sino-Forest directly. Rather, Sino-Forest used Broadridge's mailing services for that purpose, and Broadridge advises that they purge any historical information that is more than three months old. Based on this information, I believe that the NOBO list as of April 29, 2011 which I previously referred to in my last affidavit, is not in Sino-Forest's power, possession or control, and to my knowledge, information and belief, does not exist at all.

5. Therefore, based on these enquiries, I now believe that the only list of beneficial owners that is possible would be a current list, but that would be even more inaccurate than the list from April 29, 2011. From June 2, 2011 to the day when Sino-Forest's shares were cease traded, 697,899,800 shares were traded – approximately 283% of the total shares issued and outstanding. Put another way, the float of shares has turned almost three times since June 2, 2011.

6. I also wish to correct two dates in my earlier affidavit. Paragraphs 7 and 8 refer to two dates, April 5, 2012 and April 9, 2012. Those are both the dates of the press releases, not the events described therein. As set in those press releases, the resignation of Ernst & Young LLP was effective as at April 4, 2012, and the Enforcement Notice was received on April 5, 2012.

SWORN BEFORE ME at the City of Hong)
 Kong, Special Administrative Region,)
 People's Republic of China, this 20th day of)
 April, 2012)



W. Judson Martin



Yuen Tik Yan Joyce
 Solicitor
 Reed Smith
 Richards Butler
 20/F Alexandra House
 Hong Kong SAR

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Proceedings commenced in Toronto

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(Sworn April 20, 2012)**

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