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

SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST) ONTARIO

PROCEEDING COMMENCED AT TORONTO

(Motion Returnable April 13, 2012) MOTION RECORD

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Class Action against the Applicant Securities, including the Representative Plaintiffs in the Ontario Lawyers for an Ad Hoc Committee of Purchasers of the Applicant's