

Dennis F. Dunne  
Thomas. J. Matz  
Jeremy C. Hollebeak  
MILBANK, TWEED, HADLEY & M<sup>C</sup>CLOY LLP  
One Chase Manhattan Plaza  
New York, NY 10005-1413  
(212) 530-5000

*Counsel to FTI Consulting Canada Inc., as Foreign Representative  
of the Canadian Proceeding of Sino-Forest Corporation*

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

---

In re:	)	Chapter 15
	)	
SINO-FOREST CORPORATION,	)	Case No. 13-10361 (MG)
	)	
Debtor in a Foreign Proceeding.	)	

---

**JOINDER OF FOREIGN REPRESENTATIVE IN (I) MOTION TO RECOGNIZE  
AND ENFORCE ORDER OF ONTARIO COURT APPROVING ERNST & YOUNG  
SETTLEMENT AND (II) MEMORANDUM OF LAW IN SUPPORT OF MOTION  
TO RECOGNIZE AND ENFORCE ORDER OF ONTARIO COURT APPROVING  
ERNST & YOUNG SETTLEMENT**

FTI Consulting Canada Inc. (the “**Monitor**”), in its capacity as the court-appointed monitor and authorized foreign representative of the proceeding of Sino-Forest Corporation under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended), pending before the Ontario Superior Court of Justice (Commercial List), hereby joins in the (i) *Motion to Recognize and Enforce Order of Ontario Court Approving Ernst & Young Settlement* [Dkt. No. 18] (the “**Motion**”), and (ii) *Memorandum of Law in Support of Motion to Recognize and Enforce Order of Ontario Court Approving Ernst & Young Settlement* [Dkt. No. 19] (the “**Memorandum**”), and respectfully represents as follows:

**JOINDER**

The Monitor joins in the relief requested by E&Y<sup>1</sup> in the Motion for the reasons stated therein and in the Memorandum. The Monitor, through its undersigned U.S. counsel, is available at the Court's convenience should the Court have any questions or concerns.

**WHEREFORE**, the Monitor respectfully requests that this Court grant the relief requested in the Motion and any other relief the Court deems necessary or appropriate under the circumstances.

Dated: New York, New York  
September 23, 2013

**MILBANK, TWEED, HADLEY & M<sup>C</sup>CLOY LLP**

By: /s/ *Jeremy C. Hollembeak*

Dennis F. Dunne

Thomas J. Matz

Jeremy C. Hollembeak

MILBANK, TWEED, HADLEY & M<sup>C</sup>CLOY LLP

1 Chase Manhattan Plaza

New York, NY 10005

Telephone: (212) 530-5000

*Counsel to FTI Consulting Canada Inc., as Foreign  
Representative of the Canadian Proceeding of Sino-  
Forest Corporation*

---

<sup>1</sup> Capitalized terms used but not defined herein will have the meanings ascribed to them in the Motion.