## 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 AND ARRANGEMENT OF SINO-FOREST CORPORATION

Court File No.: CV-11-431153-00CP

### ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

THE TRUSTEES OF THE LABOURERS' PENSION FUND OF CENTRAL AND EASTERN CANADA, THE TRUSTEES OF THE INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 793 PENSION PLAN FOR OPERATING ENGINEERS IN ONTARIO, SJUNDE AP-FONDEN, DAVID GRANT and ROBERT WONG

**Plaintiffs** 

- and -

SINO-FOREST CORPORATION, ERNST & YOUNG LLP, BDO LIMITED (formerly known as BDO MCCABE LO LIMITED), ALLEN T.Y. CHAN, W. JUDSON MARTIN, KAI KIT POON, DAVID J. HORSLEY, WILLIAM E. ARDELL, JAMES P. BOWLAND, JAMES M.E. HYDE, EDMUND MAK, SIMON MURRAY, PETER WANG, GARRY J. WEST, CREDIT SUISSE SECURITIES (CANADA), INC., TD SECURITIES INC., DUNDEE SECURITIES CORPORATION, RBC DOMINION SECURITIES INC., SCOTIA CAPITAL INC., CIBC WORLD MARKETS INC., MERRILL LYNCH CANADA INC., CANACCORD FINANCIAL LTD., MAISON PLACEMENTS CANADA INC., CREDIT SUISSE SECURITIES (USA) LLC and MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (successor by merger to Banc of America Securities LLC)

**Defendants** 

Proceeding under the Class Proceedings Act, 1992

MOTION RECORD OF OBJECTIONS (Returnable May 11, 2015)

April 24, 2015

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Ontario Class Action

TO: THE ATTACHED SERVICE LIST

## 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

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

### 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

Court File No.: CV-11-431153-00CP

### ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

THE TRUSTEES OF THE LABOURERS' PENSION FUND OF CENTRAL AND EASTERN CANADA, THE TRUSTEES OF THE INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 793 PENSION PLAN FOR OPERATING ENGINEERS IN ONTARIO, SJUNDE AP-FONDEN, DAVID GRANT and ROBERT WONG

**Plaintiffs** 

- and -

SINO-FOREST CORPORATION, ERNST & YOUNG LLP, BDO LIMITED (formerly known as BDO MCCABE LO LIMITED), ALLEN T.Y. CHAN, W. JUDSON MARTIN, KAI KIT POON, DAVID J. HORSLEY, WILLIAM E. ARDELL, JAMES P. BOWLAND, JAMES M.E. HYDE, EDMUND MAK, SIMON MURRAY, PETER WANG, GARRY J. WEST, PÖYRY (BEIJING) CONSULTING COMPANY LIMITED, CREDIT SUISSE SECURITIES (CANADA), INC., TD SECURITIES INC., DUNDEE SECURITIES CORPORATION, RBC DOMINION SECURITIES INC., SCOTIA CAPITAL INC., CIBC WORLD MARKETS INC., MERRILL LYNCH CANADA INC., CANACCORD FINANCIAL LTD., MAISON PLACEMENTS CANADA INC., CREDIT SUISSE SECURITIES (USA) LLC and MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (successor by merger to Banc of America Securities LLC)

**Defendants** 

Proceeding under the Class Proceedings Act, 1992

AFFIDAVIT OF HEATHER PALMER (Sworn April 23, 2015)

I, HEATHER PALMER, of the City of Toronto, in the Province of Ontario

MAKE OATH AND SAY:

- 1. I am an assistant in the class action department at Koskie Minsky LLP. Koskie Minsky LLP is counsel to the plaintiffs in the above styled class action. I therefore have personal knowledge of the matters set out below.
- 2. Attached hereto as **Exhibit "A"** are the objections received in respect of the motion for approval of the dealers' settlement and class counsel's fee request.
- 3. Attached hereto as **Exhibit "B"** are the objections received in respect of the claims and distribution protocol and in respect of permitting late claims in the Ernst & Young settlement and varying the administrator's fee.

SWORN before me at the City of )
Toronto, in the Province of Ontario, )
this 23<sup>rd</sup>/day of April, 2015.

A Commissioner, etc.

Gorth Myers

Heather Palmer

This is Exhibit "A" referred to in the AFFIDAVIT OF HEATHER PALMER SWORN BEFORE ME, THIS 23<sup>RD</sup> DAY OF APRIL, 2015

A COMMISSIONER FOR TAKING AFFIDAVITS, ETC.

## ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

1, Scott Buen, Product of DR. Scott Bour From (please check all boxes that apply):

(insert name)

	(insert name)
	am a current shareholder of Sino-Forest Corporation
M	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"); persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.



ONLY	<b>SUBMIT</b>	$\mathbf{A}\mathbf{N}$	<b>OBJECTIO</b>	ON IF	YOU	DO No	<u>ot</u> like	THE	DEA	LERS
SETTL	EMENT,	THE	<b>CLAIMS</b>	AND	DISTR	RIBUTIO	N PROT	DCOL,	OR	THE
COUNS	SEL FEE A	PPLI	CATION AN	ND WIS	OT H	<b>DBJECT</b>				

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COUN	SEL FEE APPLICATION AND WISI	100	BJECI		
0	ourcel fees me	- E	xcessite	?	
	/				
	I DO NOT intend to appear at the I Settlement, the Claims and Distribution understand that my objection will be motion at 10:00 a.m. on May 11, 201 Ontario.	Protoco	l, or the Counsel th the court prio	Fee Application Fee Fee Fee Fee Fee Fee Fee Fee Fee Fe	on, and I g of the
	I DO intend to appear, in person or by co the motion to approve the Dealers Settl the Counsel Fee Application, at 10:00 a Floor Toronto, Ontario.	lement, 1	the Claims and I	Distribution Prof	tocol, or
MY A	DDRESS FOR SERVICE IS:	MY SERV	LAWYER'S ICE IS (if appli	ADDRESS cable):	FOR
Name:	DR. Sio & Bove	Name:			
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March 31, 2015

File No: 2781-002

By Email [sinoforest@siskinds.com]

Ms. Nicole Young Siskinds LLP 680 Waterloo St. PO Box 2520 London, ON N6A 3V8

Dear Ms. Young:

Re: The Trustees of The Labourers' Pension Fund of Central and Eastern Canada et al v. Sino-Forest Corporation et al. Court File No. CV-11-431153-00CP

I attach and serve on you in accordance with the Order of Justice Morawetz, dated January 29, 2015 BDO Limited's Notice of Objection relating to the Underwriters settlement.

Yours very truly,

AFFLECK GREENE McMURTRY LLP

**Kenneth A. Dekker** KAD/da

Att.

c:

Peter R. Greene
David Vaillancourt

Affleck Greene McMurtry LLP

## ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	BDO Limited	(please check all boxes that apply):
	(insert name)	•• • • • • • • • • • • • • • • • • • • •
	am a current shareholder of Sino-Forest	Corporation
0	am a former shareholder of Sino-Forest	Corporation
	am a current noteholder of Sino-Forest	Corporation
	am a former noteholder of Sino-Forest	Corporation
<u>X</u>	other (please explain)	
Def	endant in the Ontario Procee	eding.

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

ONLY SUBMIT AN OBJECTION IF YOU DO NOT LIKE THE DEALERS SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROTOCOL, OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

The Underwriters settlement does not provide for any documentary or oral discovery rights for BDO Limited or the other non-settling defendants - which is prejudicial to the non-settling defendants, contrary to the interests of justice and a departure from the discovery rights afforded to non-settling defendants in orders granted by this court to approve other settlements with defendants in the Ontario Proceeding, including the Ernst & Young and Horsley settlements.

BDO takes no position on the remainder of the terms of the settlement.

- I DO NOT intend to appear at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.
- X I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.

**ADDRESS** MY ADDRESS FOR SERVICE IS: MY LAWYER'S **FOR SERVICE IS (if applicable):** Name: Name: Affleck Greene McMurtry LLP Address: 365 Bay Street, Suite 200 Address: Toronto, ON M5H 2V1 Attn: Peter R. Greene, Kenneth Tel.: Dekker and David Vaillancourt (416) 360-2800 Tel.: Fax: Email: Fax: (416) 360-5960

pgreene@agmlawyers.com; Email: kdekker@agmlawyers.com;

dvaillancoart@agmlawyers.com

Date: March 31, 2015 Signature:

## SINO-FOREST SECURITIES LITIGATION NOTICE OF MOTION TO AUTHORIZE ADDITIONAL ADMINISTRATION FEES and TO PERMIT LATE CLAIMS in the ERNST & YOUNG SETTLEMENT

### Notice of Motion to Authorize Additional Administration Fees

NPT RicePoint Class Action Services Inc. ("NPT") is the court-appointed administrator of the settlement between the Ad Hoc Committee of Purchasers of Sino-Forest's Securities (the "Ad Hoc Committee") and Ernst & Young LLP (the "E&Y Settlement"). Due to an unexpectedly high volume of claims filed in the E&Y Settlement, materially beyond NPT's estimate in its proposal to administer the E&Y Settlement (the "Proposal"), and a corresponding increase in the amount of time required for NPT to administer the settlement, the Ad Hoc Committee seeks an order increasing NPT's fee from \$580,000 to \$1,439,125.00.

The original fee of \$580,000 proposed by NPT and approved by the court was based on an estimate that 18,200 claims would be filed and the E&Y Settlement would take 5,500 hours to administer. The Proposal provided that the Ad Hoc Committee could return to court for authorization of additional fees for NPT if there was a material increase in claims filed in the E&Y Settlement. Such a material increase has occurred, and over 49,625 claims have now been filed (2.73 times greater than anticipated in the Proposal) and NPT expects to expend approximately 12,261 hours administering the settlement (6,761 more hours than contemplated in the Proposal). In the circumstances, class counsel believes that an increase in NPT's fees from \$580,000 to \$1,439,125.00 is fair and reasonable.

#### Notice of Motion to Permit Filing of Late Claims

Pursuant to court order, the deadline to file claims in the E&Y Settlement was February 14, 2014. Since that date, NPT has received approximately 1,780 late claims (the "Late Claims"). The Ad Hoc Committee seeks a court order permitting NPT to allow filing of all Late Claims received up until May 11, 2015.

### How to Object to the Motion to Authorize Additional Administrator Fees and to Permit Compensation for Late Claims

If you would like to object to: (a) the motion to authorize additional administration fees; and/or (b) the motion to permit filing of late claims, please email <a href="mailto:siskinds.com">sinoforest@siskinds.com</a> or mail a letter to Siskinds LLP 680 Waterloo Street, PO Box 2520, London, ON N6A 3V8 Attention: Nicole Young and provide (i) your name; (ii) your reason for objecting; (iii) whether or not you intend to appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims (the time and date of which are on the notice of settlement approval, enclosed); (iv) your address for service; and (v) your lawyer's address for service (if applicable).

Your objection must be received by April 1, 2015.

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	CEORGE MICHAE BEE (please check all boxes	that apply):		
	(insert name)			
Ø	am a current shareholder of Sino-Forest Corporation			
	am a former shareholder of Sino-Forest Corporation	am a former shareholder of Sino-Forest Corporation		
	am a current noteholder of Sino-Forest Corporation			
	am a former noteholder of Sino-Forest Corporation			
	other (please explain)			

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

ONLY SUBMIT AN OBJECTION IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROFOCOL, OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

THE DEALERS MADE HUGE	Sums of Money TRADI.	NG
SINO-FORZST STOCK. TH	E DEALERS DID NOT	
CONDUCT SUFFICIENT D	UE-DILLIGENCE TO SUPP	SPT
THEIR ROLE IN MAR	VETING AND TRADING	
SECURITIES THAT WER	E WORTHLESS W THE FR	NK
	D A REASONABLE STANDARD	
I DO NOT intend to appear at the Settlement, the Claims and Distribution understand that my objection will be	hearing of the motion to approve the In Protocol, or the Counsel Fee Application filed with the court prior to the hearing 15, at 330 University Ave., 8th Floor To	Dealers , and I of the
the motion to approve the Dealers Sett	ounsel, and to make submissions at the healement, the Claims and Distribution Proton.m. on May 11, 2015, at 330 University Av	col, or
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS SERVICE IS (if applicable):	FOR
Name: GEORGE M. BEE	Name:	
Address: To THE KINGSWAY ETOBICOILE ON M8X 2T4	Address:	
161. (647) 212 6446	m.,	
Fax:	Tel.:	
Email: georgenbee e gnail	Email:	
Date: March 29, 2015 Sig	nature:	<del>^</del>

### **Nicole Young**

From:

Nina Bode <nordicsky@hotmail.com>

Sent:

Friday, March 20, 2015 12:06 AM

To:

Sino-Forest Nina Bode

Cc: Subject:

Objection Notice -- Sino Forest

**Attention: Sino Forest case** 

This is to advise you that <u>I vehemently object to (I do not agree with) each and all settlements</u> in reference to SINO FOREST case.

Thank you, Nina Bode

## ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,_	(please check all boxes that apply):
-	(insert name) /
₩/	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

[,_р	UI FUN PHOEBE CHAN (insert name)	(please check all boxes that apply):
<b>-</b> X	am a current shareholder of Sino-Forest	Corporation
$\supset$	am a former shareholder of Sino-Forest	Corporation
⊐	am a current noteholder of Sino-Forest	Corporation
	am a former noteholder of Sino-Forest C	Corporation
$\supset$	other (please explain)	
		-

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	I DO NOT intend to annear at t	the hearing of the motion to approve the Dealers	
₹	Settlement, the Claims and Distributunderstand that my objection will	ation Protocol, or the Counsel Fee Application, and I be filed with the court prior to the hearing of the 2015, at 330 University Ave., 8th Floor Toronto,	
	I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.		
MY A	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):	
Name	: PUI FUN PHOEBE CHAN	Name:	
Addre	68 KEN LAUSHWAY AVE., <sup>SS</sup> STOUFFVILLE, ONTARIO CANADA L4A 0J3	Address:	
Tel.:	416 275 2616		
Fax:	416 321 6388	Tel.:	
Email:		Fax:	
	phoebe8072000@yahoo.ca	Email:	
Date:	25 MARCH 2015	Signature:	

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ONN6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

I ,	SH Your CHEN (please check all boxes that apply):
	(insert name)
	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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SETT	Y SUBMIT AN OBJECTION IF TLEMENT, THE CLAIMS AND NSEL FEE APPLICATION AND WIS	DISTRIBUTION PROTOCOL, OR THE
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▼	Settlement, the Claims and Distribution understand that my objection will be	hearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 15, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers Sett	ounsel, and to make submissions at the hearing of lement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
	: SHI YOUL CHEN	Name:
Addre	CORONTO, ONT.	Address:
Tel.:	MIS 2C2 416-898-8803	
Fax:		Tel.:
Email	:	Fax:
		Email:
Date:	MOR 12, 2015 Sig	nature: Sylvas avan

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,_	(insert name) (please check all boxes that apply):
	am a current shareholder of Sino-Forest Corporation
DB/	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)
	·

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œ e	Settlement, the Claims and Distribution understand that my objection will be it	Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers Settl	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name:	: IAIN B CHWAINGHAUL	Name:
Addre	SS: 523 BUCHAJAN CZ OTTANA CONTACIO	Address:
Tel.:	613 747 - 5597	
Fax:		Tel.:
Email:	CONSUSEHOOM @ SYNAATED	Fax:
		Email:
Date:	16TH March 2015 Sig	nature: The Schuley Con

### **Heather Palmer**

From: real danjou <danjou.com@hotmail.com>

Sent: March-18-15 11:38 AM
To: Sino-Forest; d'ANJOU REAL

Subject: Opposition

**Attachments:** 001 (2).jpg; 001.jpg

Bonjour Mme. Nicole Toung, vous trouverez ci-joint ,mon avis d'opposition au règlement des honoraires des avocats que je considère abusif et démesuré ,comparativement à mes économies investies dans cette société qui ne mérite pas ma confiance.

Bien à vous : Réal d'Anjou ing. M.Sc.

2777 ch. Georgeville Magog P.Q. J1X 0M8

#### AVIS D'OPPOSITION

### UTILISEZ UNIQUEMENT CE FORMULAIRE SI LE RÈGLEMENT DES COURTIERS, LE PROTOCOLE DE RÉCLAMATIONS ET DISTRIBUTION OU L'APPLICATION DES HONORAIRES D'AVOCAT <u>NE VOUS CONVIENNENT PAS</u> ET SI VOUS SOUHAITEZ Y OPPOSER VOTRE OBJECTION

### À: SISKINDS LLP

680 Waterloo Street C.P. 2520 London (Ontario) N6A 3V8

À l'attention de : Nicole Young

Adresse courriel: sinoforest@siskinds.com

Objet: Je soussig	SINO-FOREST CORPORATION – RÈGLEMENT DES COURTIERS  gné(e), (insérez le nom)  CEAL L'AN JOU	iquent) :
ø –	suis à présent un(e) actionnaire de Sino-Forest Corporation	
	suis à présent un(e) ancien(ne) actionnaire de Sino-Forest Corporation	
	suis à présent un(e) porteur(e) de titres de Sino-Forest Corporation	
	suis à présent un(e) ancien(ne) porteur(e) de titres de Sino-Forest Corporation	
	Autre (veuillez préciser)	en e
		<del></del> .

Je reconnais qu'en vertu de l'ordonnance rendue par le juge, monsieur Morawetz, en date du 29 janvier 2015 (l'« Ordonnance »), les personnes qui souhaitant opposer une objection au règlement des Courtiers, au Protocole de réclamations et distribution ou à l'application des honoraires d'avocat doivent remplir le présent Avis d'opposition et l'envoyer à Siskinds LLP par courrier, messagerie ou courriel de sorte qu'il soit reçu au plus tard le 1er avril 2015 à 17 heures (HNE).

Par les présentes, je donne avis que j'oppose mon objection au règlement des Courtiers, au Protocole de réclamations et distribution ou à l'application des honoraires d'avocat pour les motifs suivants (veuillez ajouter des pages supplémentaires si plus d'espace est nécessaire):

SOUMETTEZ UNIQUEMENT VOTRE OJECTION SI LE RÈGLEMENT DES COURTIERS, LE PROTOCOLE DE RÉCLAMATIONS ET DISTRIBUTION OU L'APPLICATION DES HONORAIRES D'AVOCAT NE VOUS CONVIENNENT PAS

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des Courtiers, du Protocole de réclamations et	r à l'audience portant sur la motion d'approbation du règlement distribution ou de l'Application des honoraires d'avocat, et je uprès de la Cour avant Ia tenue de ladite audience à 10 heures 0 University Ave., 8e étage, Toronto (Ontario).
motion d'approbation du règlement des Cou l'Application des honoraires d'avocat, et j'ai l'i	personne, soit par avocat interposé, à l'audience portant sur la artiers, du Protocole de réclamations et distribution ou de intention de faire des soumissions lors de ladite audience à 10 nte : 330 University Ave., 8e étage, Toronto (Ontario).
MON ADRESSE DE RÉCEPTION DE LA SIGNIFICATION :	L'ADRESSE DE RÉCEPTION DE LA SIGNIFICATION DE MON AVOCAT (le cas échéant) :
Nom: REAL JANJOU	Nom:
Adresse: 2777 CH. GEORGEVICE	/Adresse:
Adresse: 2777 CH. GEORGEVIC MAGOG P.Q. IIX OMB	_
Téléphone: 819-847-2388	Téléphone:
Télécopieur :	Télécopieur:
Adresse courriel:	Adresse courriel:
Date: 18 MAS 2015 S	com (): Off
Date: 18 M AS 2015 s	lignature:       Lax (1) wor www

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP 680 Waterloo Street PO Box 2520

London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

# I, VEERA NARAYANA GUNDAPA (please check all boxes that apply): (insert name) am a current shareholder of Sino-Forest Corporation am a former shareholder of Sino-Forest Corporation am a current noteholder of Sino-Forest Corporation am a former noteholder of Sino-Forest Corporation other (please explain)

l acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

ONLY SUBMIT AN OBJECTION IF SETTLEMENT, THE CLAIMS AND I COUNSEL FEE APPLICATION AND WISH	DISTRIBUTION PROTOCOL, OR THE
I do not like the	dealers settlement, the
claims and distribution	Protocol or the coursel
	I wish to object
_ strongly as I believ	e would negatively impact the basic right for
	ultimately follow the
Arral count order	,, <u> </u>
Settlement, the Claims and Distribution understand that my objection will be f motion at 10:00 a.m. on May 11, 201 Ontario.	pearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto, bunsel, and to make submissions at the hearing of
the motion to approve the Dealers Settle	ement, the Claims and Distribution Protocol, or on. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR
VEERA NARAYANA Name: GUNDAPANENI	SERVICE IS (if applicable):  Name:
Address: 86-GIBBS STREET  SAULT STE MARIE, ONTARIO P6A 5H4  Tel.: 905 867 7331	Address:  Tel.:  Fax:  NOT  APPLICABLE  Finally  Tel.:
Fax: 705 945 2908	Tel.:
Email: Veera 12345@ Live ca	Fax: NO
Date: <u>MarcW</u> 30, 2015 Sign	nature: <u>Gundanad</u>

## ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

#### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

•	current shareholder of Sino-Forest Corporation former shareholder of Sino-Forest Corporation
□ am a f	former shareholder of Sino-Forest Corporation
	•
□ am a o	current noteholder of Sino-Forest Corporation
□ amat	former noteholder of Sino-Forest Corporation
□ other	(please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

COUNSEL FEE APPLICATION AND WIS	SH TO OBJECT
	·
Settlement, the Claims and Distributio understand that my objection will be	hearing of the motion to approve the Dealers in Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 015, at 330 University Ave., 8th Floor Toronto,
the motion to approve the Dealers Set	counsel, and to make submissions at the hearing of tlement, the Claims and Distribution Protocol, or a.m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: TimoTHY P. DELESALLE	Name:
Address: 4085 E. 2ND Ave. Burnely BC VSC-3XI.	Address:
Tel.: 60A 293-2850	
Fax: 604 293-2853	Tel.:
Email: To Dales Me Canail Con	Fax:
·	Email:
<b></b>	
Date: March 3/ 2015 Si	ignature:

# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

### TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

I, HENRY & EISCNEER (please check all boxes that apply):

	(insert name)	ſ	•
<b>a</b>	am a current shareholder of Sino-Forest Corporation		
	am a former shareholder of Sino-Forest Corporation		
	am a current noteholder of Sino-Forest Corporation		
	am a former noteholder of Sino-Forest Corporation		
	other (please explain)		
•			 

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ONLY SUBMIT AN OBJECTION IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROTOCOL, OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

JAM OBJECTING TO THE PROPOSED SETTLEHENT WITH

THE AFALERS, THIS IS FARRELOW WHAT IT SHOULD BE,

WHEN YOU REALIZE THE HONEY THEY WAVE IT SHOULD BE 10 TIMES

AS MUCH, IN THIS CASE I WOULD NOT OBJECT TO THE

COUNSEL FEE AND THE DISTRIBUTION, OTHERWISE THE

FEE FOR COUNSEL IS ALSO TO HUCH,

I HERRY DESINGER

- I DO NOT intend to appear at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.
- I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.

MY ADDRESS FOR SERVICE IS:

MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):

Name: HENRY DEISINGER

Name:

Address: 1312 WHARF STR.

Address:

PICKERING ON, LIWIAY

Tel.: 905 839 5586

Fax: HOIGG & SYMPATICO, CATEL:

Email: HD, GG & SYMPATICO, CAFAX:

Email:

Date: Marel 57 2015

Signature:

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TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

I, Undy Hushon / Warren Zackor (please check all boxes that apply): (insert name)			
D	am a current shareholder of Sino-Forest Corporation		
	am a former shareholder of Sino-Forest Corporation		
	am a current noteholder of Sino-Forest Corporation		
	am a former noteholder of Sino-Forest Corporation		
	other (please explain)		

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SETT	Y SUBMIT AN OBJECTION LEMENT, THE CLAIMS AN NSEL FEE APPLICATION AND V	•
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	, , . 	
	Settlement, the Claims and Distribution understand that my objection will	the hearing of the motion to approve the Dealers ation Protocol, or the Counsel Fee Application, and I be filed with the court prior to the hearing of the 2015, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers	by counsel, and to make submissions at the hearing of Settlement, the Claims and Distribution Protocol, or 00 a.m. on May 11, 2015, at 330 University Ave., 8th
MY A	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	: Cirdy Hurshon	Name:
Addre	: Cindy Hurshon ss: 670 Grosvenor Ave	Address:
We	estmount, QC H3Y2S8	· · · · · · · · · · · · · · · · · · ·
Tel.:	514-484-6950	
Fax:		Tel.:
Email: brershon. Cindy 0 gmail.com		Fax:
	gman-com	Email:
Date:	mar. 10,2015	Signature: 6-Huckow

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680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,_	(insert name) (please check all boxes that apply):
	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

SETT	Y SUBMIT AN OBJECTION LEMENT, THE CLAIMS ANSEL FEE APPLICATION AND	ND DISTRIBUTION PROTOCOL, OR THE
COU	nsel fee afflication and	WISH TO OBJECT
		<u>:</u>
t ·	Settlement, the Claims and Distril understand that my objection will	the hearing of the motion to approve the Dealers bution Protocol, or the Counsel Fee Application, and I ll be filed with the court prior to the hearing of the 1, 2015, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealer	r by counsel, and to make submissions at the hearing of s Settlement, the Claims and Distribution Protocol, or 0:00 a.m. on May 11, 2015, at 330 University Ave., 8th
MY A	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	→ is & Clare Johnston	Name:
Addn	Clair Hills #207 530 Columbia St. West Waterloo, ON N2T 0B1	Address:
Tel.:	519 744 9728	
Fax:		Tel.:
Email:	:	Fax:
		Email:
Date:	Mar 5/15	Signature:

# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

### TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

### I, Gordon Jiang (please check all boxes that apply):

<del></del>	am a current shareholder of Sino-Forest Corporation
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	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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Following objection is applied for this settlement and for the previous E&Y settlement because both of them use the same calculation.

1. The Claims and Distribution Protocol is not fair to current Sino-Forest shareholders. Specifically, the protocol contains following calculation for purchase damages in #9 (c) on page 5:

For each type of purchase of Securities, the damages for those purchases are calculated as follows:

Time of Sale of Securities	Damages
Sold before June 2, 2011	No damages
Sold from June 3 to August 25, 2011	(#of Securities sold) X (ACB - Sale Price)
Sold or held after August 25, 2011	(#of shares sold or held) X (ACB per share - CAD\$1.40)

I strongly object to above protocol for the last type of purchase of Securities. First of all, shareholders in Canadian primary stock market have no way to sell their shares after August 25, 2011 because the stock had been delisted from TSX on the date. Secondly, it is totally not reasonable to subtract CAD\$1.40 in the damage calculation for the persons who did not sell their shares from June 3 to August 25, 2011. Sino-Forest and E&Y misled investors both before and after June 2, 2011 by false financial statements. Allen Chan, the then CEO of Sino-Forest, made public speech by video in the company's website to deny the fraudulence and kept cheating investors between June 3, 2011 and August 25, 2011. Even through August 26, 2011, Sino-Forest's audit financial statements were not withdrawn. It did not admit to any fraudulent conduct. In fact, E&Y did not withdraw its audit opinion on the company's financial statements until 2012, long after the stock was cease-traded in TSX by Ontario Securities Commission (OSC) on August 26, 2011. As this class action is against Sino-Forest and other defendants for filing false and misleading statements, why does the protocol calculate damages in different ways for the shareholders who sold between June 3 and August 25, 2011 and the shareholders who did not sell? This does not make any sense.

The reasonable calculation for current shareholders should be: (#of shares held) X (ACB per share)

2. The Dealers Settlement states that class counsel fee, disbursements, and administration fees will be deducted from settlement amount before it is distributed to securities claimants. This is not reasonable as it will significantly affect what securities claimants can receive. I object to the Dealers Settlement and would like to request that all these costs be paid separately by the defendants.

\_\_\_\_\_

I DO NOT intend to appear at the hearing of the motion to approve the Dealers Settlement the Claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.			
motion to approve the Dealers Settle	ounsel, and to make submissions at the hearing of the ement, the Claims and Distribution Protocol, or the m. on May 11, 2015, at 330 University Ave., 8th		
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):		
Name: Gordon Jiang	Name:		
Address: 47 Crawford St. Markham, ON L6C 2M3	Address:		
Tel.: 289-800-9084(Work) / 905-887- 4801(Home)			
Fax:	Tel.:		
Email: GLJIANG@YAHOO.COM	Fax:		
Zinani Ozoravog marco.com	Email:		
Date: March 30, 2015	Signature:		

### ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

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	am a current shareholder of Sino-Forest Corporation		
	am a former shareholder of Sino-Forest Corporation		
	am a current noteholder of Sino-Forest Corporation		
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	other (please explain)		

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	YOU <u>DO NOT</u> LIKE THE DEALERS DISTRIBUTION PROTOCOL, OR THE I TO OBJECT
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SOME SETTLEMENT	TO ME FOR MY SHARES
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RECEIVING VOTING PAPER	
WHEN SINO WENT BUST	
Settlement, the Claims and Distribution understand that my objection will be f	pearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
the motion to approve the Dealers Settl	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: KENNETH JONES	Name:
Address: 2175/1607  MARINE DRIVE.  OAKVILLE ON T  LGLSLE	Address:
905 465 1)77	
Eax:	Tel.:
Email:	Fax:
	Email:
Date: 28 MAR 2015 Sign	nature: Komb

I O CANADA U

NPT RICEPOINT CLASS ACTION SERVICES SINO. POREST CLASS ACTION

PO BOX 3355 LONDON, ON

LONDON, ONT NOA 4 KB

Keuneth Jones 1607-2175 Marine Dr Oakville ON L6L 5L5

### ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

DF.	SINO_FOREST	COPPORATION	- DEALERS SETTLEMENT
KE:	OHIO-FUKEO	LUKTUKATION -	– Nevreko of i i femen i

1, <u>Ke</u>	ARBARA: A. KNOBLAUCH  (insert name)	(please check all boxes that apply):
ر ۵	am a current shareholder of Sino-Fo	rest Corporation
	am a former shareholder of Sino-For	rest Corporation
	am a current noteholder of Sino-For	est Corporation
	am a former noteholder of Sino-Fore	est Corporation
	other (please explain)	

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	H TO OBJECT
PLEASE SEE ATTACHED	LETTER-
	<del></del>
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the motion to approve the Dealers Settl	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR
BAKBARA A. KNOBLAUCH Name: KEUIN H. KNOBLAUCH	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):  Name:
BAKBARA A. KNOBLAUCH Name: KEUIN H. KNOBLAUCH	SERVICE IS (if applicable):
BAKBARA A. KNOBLAUCH Name: KEUIN H. KNOBLAUCH Address: 1040-102md AUE. VIG 2B8 DAWSON CREEK, B.C.	SERVICE IS (if applicable): Name:
Address: 1040-102md AUE. VIG 2B8 DAWSON CREEK, B.C. Tel.: 250-806-0046	SERVICE IS (if applicable): Name:
BARBARA A. KNOBLAUCH Name: KEUIN H. KNOBLAUCH Address: 1040-102md AUE. VIG 2B8 DAWSON CREEK, B.C.  Tel.: 250-806-0046  Fax: N/A. Email: N/A.	SERVICE IS (if applicable):  Name:  Address:  Tel.:  Fax:
BARBARA A. KNOBLAUCH Name: KEUIN H. KNOBLAUCH Address: 1040-102md AUE. VIG 2B8 DAWSON CREEK, B.C.  Tel.: 250-806-0046  Fax: N/A. Email: N/A.	SERVICE IS (if applicable):  Name:  Address:  Tel.:

Kevin & Barbara Knoblauch 1040-102 Ave., V1G 2B8 Dawson Creek, B.C.

March 15, 2015

Sino-Forest Securities Class Action Notice Administrator P.O. Box 3355 N6A 4K3 London, Ontario

Siskinds LLP 680 Waterloo Street, P.O. Box 2520 London ON N6A 3V8

**Attention Nicole Young** 

The claimants Kevin and Barbara Knoblauch object to the request for increased Administration costs paid for from disbursements to claimants. All these should be paid by the broker/dealers/banks, not the class action claimants.

We object to any settlement on behalf of the brokers/dealers/banks that does not include full re-imbursement with interest to us for our Sino Forest loss.

We remember distinctly being given glowing official reports by T.D. Waterhouse, as they in fact dumped their shares onto unsuspecting clients like us, in full knowledge of the coming downgrades for Sino-Forest. Sino-Forest went from a "top pick" report on their official website, by T.D. Waterhouse Analysts, to a non existent report about the day after I was lied to by a T.D. Waterhouse representative on the phone. We would never have bought this company if T.D. Waterhouse had been in full disclosure about Sino-Forest.

It is our contention that late claims are late because they were informed late by their broker/dealer, holding back mailouts as their lawyers scrambled about how to cover. We want all our money back from T.D. Waterhouse, so must object to late filings and the proposed \$32,500,000 settlement. Banks and their Trading Divisions and Companies have a duty to be honest with their clients.

We require full Dealer/Broker responsibility. Of course our interest in "direct investing" was seriously undermined, so we also claim loss of opportunity should apply to all class action claimants who were also duped like us. Please register our claim of loss of opportunity with the court. We would appreciate your filing this letter of objection before the Hearing, as we will not be in attendance.

Sincerely,

Bullian Farbland

Kevin and Barbara Knoblauch

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TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ONN6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

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Name: MARGARET EUNG Name:  Address: DDL E087 33 RD AVE Address:  VANCOUYER RC  Tel.: 644) 435963  Fax: Tel.:  Email: Fax:			.00 a.m. on way 11, 2013, at 330 Omvoisit
VANCOUYER BC  Tel.: $45N3E9$ Fax: Tel.:  Email: Fax:	MY A	Floor Toronto, Ontario.	MY LAWYER'S ADDRES
Tel.: 604) 435963 Tel.: Email: Fax:	Name	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  HARGARET EUNG	MY LAWYER'S ADDRES SERVICE IS (if applicable): Name:
Email: Fax:	Name	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  HADGARET ELING  ESS: WALE-EBST 33 BJ 4.	MY LAWYER'S ADDRESS SERVICE IS (if applicable):  Name:  Address:
Email: Fax:	Name Addre	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  ELING ESS: WARGARET ELING ESS: WAR COUVER E	MY LAWYER'S ADDRESS SERVICE IS (if applicable):  Name:  Address:
	Name Addre	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  ELING ESS: WARGARET ELING ESS: WAR COUVER E	MY LAWYER'S ADDRES SERVICE IS (if applicable):  Name:  Address:
Email:	Name Addre	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  EMARGARET EUNG  ESS: WALE-EOST 33 BD +  VANCO UYER E  VS-N 3E9  604)4359633	MY LAWYER'S ADDRES SERVICE IS (if applicable):  Name:  Address:  Tel.:
	Name Addre	Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  EMARGARET EUNG  ESS: WALE-EOST 33 BD +  VANCO UYER E  VS-N 3E9  604)4359633	MY LAWYER'S ADDRES SERVICE IS (if applicable):  Name:  Address:  Tel.:  Fax:

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Attention: Nicole Young

Email: sinoforest@siskinds.com

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<b>X</b>	am a current shareholder of Sino-Forest Corporation
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MY A	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	Joh. J. v.d. Brocke Mackenb	rodName:
Addre	ess: Am Jaegerhaun 11	Address:
Tel.:	::Joh.J. v.d. Brocke Mackenb ess: Am Jaegerhauw II 48291 Telgte Germany	
Fax:	+ 49 251 9280561	Tel.:
Email	1: jjvdbm@gmx.de	Fax:
	00	Email:
Date	: <u>3/9/15</u> s	Signature:
		(9 U. i)

### SINO-FOREST SECURITIES LITIGATION NOTICE OF PROPOSED SETTLEMENT WITH:

Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd., Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith Incorporated (successor by merger to Banc of America Securities LLC)

TO: All persons and entities, wherever they may reside, who acquired any securities of Sino-Forest Corporation including securities acquired in the primary, secondary, and over-the-counter markets (the "Securities Claimants").

### READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS. YOU MAY NEED TO TAKE PROMPT ACTION

### IMPORTANT DEADLINES

•

Objection Deadlines (for those who wish to object or make April 1, 2015 (Ontario submissions regarding the proposed settlements with the Dealers or recognition and enforcement of any order approving such proposed settlements in the United States. See pages 3 & 4 for more details)

Superior Court); and May 29, 2015 (United States Bankruptcy Court)

### Background of Sino-Forest Class Action and CCAA Proceeding

In June and July of 2011, class actions were commenced in the Ontario Superior Court of Justice (the "Ontario Proceeding") and the Ouebec Superior Court (the "Quebec Proceeding") by certain plaintiffs (the "Canadian Plaintiffs") against Sino-Forest Corporation ("Sino-Forest"), its auditors, a consulting company, its senior officers and directors, Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd., Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith Incorporated (successor by merger to Banc of America Securities LLC) (the "Dealers"). In January 2012, a proposed class action was commenced by certain plaintiffs (together with Canadian Plaintiffs, the "Plaintiffs") against Sino-Forest and other defendants in the Supreme Court of the State of New York which was removed to and is now pending in the United States District Court for the Southern District of New York (the "U.S. Action") (together with the Ontario Proceeding and the Ouébec Proceeding, the "Proceedings"). The Proceedings alleged, inter alia, that the public filings of Sino-Forest contained false and misleading statements about Sino-Forest's financial results, assets, business, and transactions.

Since that time, the litigation has been vigorously contested. On March 30, 2012, Sino-Forest obtained creditor protection under the Companies' Creditors Arrangement Act (the "CCAA"), and the Ontario Superior Court ordered a stay of proceedings against the company and other parties (the "CCAA Proceeding"). Orders and other materials relevant to the CCAA Proceeding can be found at the CCAA Monitor's http://cfcanada.fticonsulting.com/sfc/ (the "Monitor's Website").

On December 10, 2012, the Ontario Superior Court entered an order (the "Plan Sanction Order") approving a Plan of Arrangement in the CCAA Proceeding. As part of the Plan of Arrangement, the court approved a framework by which the Plaintiffs may enter into settlement agreements with any of the third-party defendants to the Proceedings.

On February 4, 2013, a proceeding was commenced in the United States Bankruptcy Court for the Southern District of New York (the "United States Bankruptcy Court") captioned In re Sino Forest Corporation, Case No. 13-10361 (MG) (the "Chapter 15 Proceeding") seeking recognition of the CCAA Proceeding and an order recognizing and enforcing the Plan Sanction Order in the United States. On April 15, 2013, the United States Bankruptcy Court entered an order recognizing and enforcing the Plan Sanction Order in the United States.

Shortly prior to the commencement of the CCAA Proceeding, the Plaintiffs entered into a settlement agreement with Pöyry (Beijing) Consulting Company Limited (the "Pöyry Settlement"). The Pöyry Settlement was approved by courts in Ontario and Québec, and January 15, 2013 was fixed as the date by which members of the class could opt of the Proceedings. The opt out period has now expired. No person may now opt out of the Proceedings.

To date, the claims in the Proceedings against the defendants Ernst & Young and David J. Horsley have also been settled and approved by the Ontario Superior Court. Those settlements have been recognized by the United States Bankruptcy Court in the Chapter 15 Proceeding.

On January 12, 2015, the Ontario Superior Court certified the Ontario Proceeding and granted leave to the Plaintiffs to pursue claims made pursuant to Part XXIII.1 of the Ontario Securities Act (and equivalent legislation in other Provinces) as against Sino-Forest, BDO Limited, Allen T.Y. Chan, W. Judson Martin, Kai Kit Poon, William E. Ardell, James P. Bowland, James M.E. Hyde, Edmund Mak, Simon Murray, Peter Wang, and Garry J. West.

### Who Acts for the Securities Claimants

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Koskie Minsky LLP, Siskinds LLP, Siskinds Desmeules, sencrl, and Cohen Milstein Sellers & Toll PLLC (collectively, "Class Counsel") represent the Securities Claimants in the Proceedings. If you want to be represented by another lawyer, you may hire one to appear in court for you at your own expense.

You will not have to directly pay any fees or expenses to Class Counsel. However, Class Counsel will seek to have their fees and expenses paid from any money obtained for the class or paid separately by the defendants.

### Proposed Settlement with the Dealers

The Plaintiffs have entered into a proposed settlement with the Dealers (the "Settlement Agreement"). The Settlement Agreement would settle, extinguish and bar all claims, globally, against the Dealers in relation to Sino-Forest including the allegations in the Proceedings. The Dealers do not admit to any wrongdoing or liability. The terms of the proposed settlements do not involve the resolution of any claims against Sino-Forest or any of the other remaining defendants. For an update on CCAA orders affecting Sino-Forest, please see the Monitor's Website. A complete copy of the proposed Settlement Agreement and other information about these Proceedings is available on the website of Koskie Minsky LLP, at www.kmlaw.ca/sinoforestclassaction, on the website of Cohen Milstein Sellers & Toll PLLC at http://www.cohenmilstein.com/cases/274/sino-forest ("Cohen Milstein Website") and on www.sinosettlement.com (collectively, the "Class Action Websites").

The Settlement Agreement, if approved and its conditions fulfilled, provides that CAD\$32,500,000 (the "Settlement Amount") shall be paid into an interest bearing account for the benefit of the Securities Claimants until such time that it is distributed pursuant to orders of the Ontario Superior Court and to pay legal fees and disbursements.

In return, the Proceedings will be dismissed against the Dealers, and there will be an order forever barring all claims against them in relation to Sino-Forest, including any allegations relating to the Proceedings. Such order will be final and binding and there will be no ability to pursue a claim against the Dealers through an opt-out process under class proceedings or similar legislation.

The proposed settlement with the Dealers is subject to court approval, as discussed below.

### Hearing to Approve the Settlement Agreement, Class Counsel Fees, and the Claims and Distribution Protocol on May 11, 2015 in Toronto, Ontario

On May 11, 2015 at 10:00 a.m. (ET), there will be a hearing before the Ontario Superior Court of Justice at which Class Counsel will seek that Court's approval of i) the Settlement Agreement; ii) the fees and expense reimbursement requests of Class Counsel; and iii) a plan of allocation and distribution of the Settlement Amount (the "Claims and Distribution Protocol") (together, the "Ontario Approval Motion"). The hearing will be held at the Canada Life Building, 330 University Avenue, 8<sup>th</sup> Floor, Toronto, Ontario. The exact courtroom number will be available on a notice board on the 8<sup>th</sup> Floor.

The proposed Claims and Distribution Protocol sets out, among other things, i) the method by which the Administrator (defined below) will review and process claims forms; and ii) the method by which the Administrator will calculate the amount of compensation to be distributed to each Securities Claimant, including the Allocation System, which assigns different risk adjustment factors to different Sino-Forest securities depending on factors such as the type of security acquired and the time that security was acquired. Persons that suffered the same loss on their Sino-Forest securities may receive different levels of compensation, depending on the risk adjustment factors assigned to their securities.

The detailed proposed Claims and Distribution Protocol can be found at the Class Action Websites, or by contacting Class Counsel at the contact information set out at the end of this notice.

At the Ontario Approval Motion, the court will determine whether the Settlement Agreement and the Claims and Distribution Protocol are fair, reasonable, and in the best interests of Securities Claimants. At that hearing, Class Counsel will also seek court approval of its request for fees and expense reimbursements ("Class Counsel Fees"). As is customary in class actions, Class Counsel is prosecuting and will continue to prosecute this class action on a contingent fee basis. Class Counsel is paid only where there is recovery for the class, and Class Counsel funds the out-of-pocket expenses of conducting the litigation in the interim. Class Counsel will be requesting the following fees and disbursements to be deducted from the Settlement Amount before it is distributed to Securities Claimants:

Siskinds LLP, Koskie Minsky LLP, Siskinds Desmeules, sencrl

Amount requested: up to \$5,517,207 plus disbursements (expenses), plus taxes

Cohen Milstein Sellers & Toll PLLC

Amount requested: \$194,620 plus disbursements (expenses), plus taxes

The court materials in support of these fee and disbursement requests will be posted on the Class Action Websites prior to the Distribution Protocol and Fee Hearing.

Expenses incurred or payable relating to notification, implementation, and administration of the settlement ("Administration Expenses") will also be paid from the Settlement Amount.

All Securities Claimants may attend the hearing of the Ontario Approval Motion and ask to make submissions regarding the proposed settlement with the Dealers.

Persons intending to object to the approval of the Settlement Agreement, the Allocation and Distribution protocol or fee and expense application are required to deliver a Notice of Objection, substantially in the form that can be found on the Class Action Websites, and, if this Notice is received by mail or email, enclosed with this Notice (the "Notice of Objection"), to Siskinds LLP by regular mail, courier, or email transmission, to the contact information indicated on the Notice of Objection, so that it is received by no later than 5:00 p.m. on April 1, 2015. Copies of the Notices of Objection sent to Siskinds LLP will be filed with the Ontario Superior Court.

Following the hearing of the Ontario Approval Motion, if the settlement is approved, there will be a hearing in the United States Bankruptcy Court in connection with the Chapter 15 Proceeding for an order recognizing and enforcing the order granting approval of the Dealers Settlement in the United States.

### Hearing for Recognition and Enforcement on June 9, 2015 in New York, New York

Among other things, the Settlement Agreement is conditioned on the entry of an order recognizing and enforcing the order granting the Ontario Approval Motion with respect to the Dealers Settlement in the United States. Accordingly, United States bankruptcy counsel for the Plaintiffs, Lowenstein Sandler LLP will file a motion (the "Dealers Settlement Recognition Motion") with the United States Bankruptcy Court seeking such relief, subject to the result of the Ontario Approval Motion. Copies of the Dealers Settlement Recognition Motion will be available on the Class Action Websites.

On June 9, 2015, at 10:00 a.m. (ET), a hearing has been scheduled on the Dealers Settlement Recognition Motion before the Honorable Martin Glenn, United States Bankruptcy Judge, in Courtroom 501 of the United States Bankruptcy Court, One Bowling Green, New York, New York. If the Ontario Approval Motion is granted, the United

States Bankruptcy Court will consider on June 9, 2015, or a later date if necessary, whether to grant an order recognizing and enforcing the order granting the Ontario Approval Motion with respect to the Dealers Settlement in the United States.

Any objections or responses to the Dealers Settlement Recognition Motion, which will be considered separately by the United States Bankruptcy Court from any objections made with respect to the Ontario Approval Motion, must be made in accordance with the United States Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the Bankruptcy Court. In addition, such objection or response must be made in writing describing the basis therefore and filed with the United States Bankruptcy Court electronically in accordance with General Order M-399 by registered users of the United States Bankruptcy Court's electronic case filing system, and by all other parties in interest, on a 3.5 inch disc, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, with a hard copy to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, Southern District of New York, One Bowling Green, New York, NY 10004-1408 and served upon United States bankruptcy counsel for the Dealers at Sherman & Sterling LLP, 599 Lexington Avenue, New York, NY 10022, United States Attention: Jaculin Aaron, and United States bankruptcy counsel for the Plaintiffs, Lowenstein Sandler LLP, 1251 Avenue of the Americas, New York, N.Y. 10020, Attention: Michael S. Etkin and Andrew D. Behlmann, so as to be received by them no later than May 29, 2015 at 5 p.m. (ET).

THE ONTARIO SUPERIOR COURT MAY APPROVE A CLAIMS AND DISTRIBUTION PROTOCOL THAT IS DIFFERENT THAN THE CLAIMS AND DISTRIBUTION PROTOCOL THAT IS PROPOSED BY CLASS COUNSEL. WHETHER OR NOT THEY SUBMIT A VALID CLAIM FORM, ALL PERSONS OR ENTITIES THAT ARE ENTITLED TO PARTICIPATE IN THE DEALERS SETTLEMENT WILL BE BOUND BY THE CLAIMS AND DISTRIBUTION PROTOCOL, WHATEVER IT MAY BE, THAT IS APPROVED BY THE ONTARIO SUPERIOR COURT.

### The Administrator

The Ontario Superior Court has appointed NPT RicePoint as the Administrator of the settlement. The Administrator will, among other things: (i) receive and process the claim forms; (ii) make determinations of Class Members' eligibility for compensation pursuant to the Claims and Distribution Protocol; (iii) communicate with Class Members regarding their eligibility for compensation; and (iv) manage and distribute the net settlement amount. The Administrator can be contacted at:

Mailing Address: NPT RicePoint Class Action Services

Sino-Forest Class Action

P.O. Box 3355

London, ON N6A 4K3

Telephone: 1-866-432-5534

Email Address: sino@nptricepoint.com
Website: www.nptricepoint.com

### **Further Information**

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If you would like additional information, please contact Koskie Minsky LLP, Siskinds LLP, Siskinds Desmeules sencrl, or Cohen Milstein Sellers & Toll PLLC using the information below:

Garth Myers, Jonathan Ptak

Koskie Minsky LLP

20 Queen St. West, Suite 900, Box 52, Toronto, ON, M5H 3R3

Re: Sino-Forest Class Action

Tel: 1.866.474.1739 (within North America)
Tel: 416.595.2158 (outside North America)
Email: sinoforestclassaction@kmlaw.ca

Dimitri Lascaris, Charles Wright
Siskinds LLP
680 Waterloo Street, P.O. Box 2520 London, ON N6A 3V8
Re: Sino-Forest Class Action
Tel: 1.800.461.6166 x 2380 (within North America)

Tel: 519.672.2251 x 2380 (outside North America)

Email: sinoforest@siskinds.com

Simon Hebert
Siskinds Desmeules, sencrl
43 Rue Buade, Bureau 320, Québec City, Québec, G1R 4A2
Re: Sino-Forest Class Action
Tel: 418.694.2009
Email: simon.hebert@siskindsdesmeules.com

Richard Speirs, Genevieve Fontan Cohen Milstein Sellers & Toll, PLLC 88 Pine Street New York, NY 10005 Tel. 212.838.7797 Email: lawinfo@cohenmilstein.com

### Interpretation

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If there is a conflict between the provisions of this notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

Please do not direct inquiries about this notice to the Ontario Superior Court or the United States Bankruptcy Court. All inquiries should be directed to Class Counsel.

DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO SUPERIOR COURT OF JUSTICE

### SINO-FOREST SECURITIES LITIGATION NOTICE OF MOTION TO AUTHORIZE ADDITIONAL ADMINISTRATION FEES and TO PERMIT LATE CLAIMS in the ERNST & YOUNG SETTLEMENT

### Notice of Motion to Authorize Additional Administration Fees

NPT RicePoint Class Action Services Inc. ("NPT") is the court-appointed administrator of the settlement between the Ad Hoc Committee of Purchasers of Sino-Forest's Securities (the "Ad Hoc Committee") and Ernst & Young LLP (the "E&Y Settlement"). Due to an unexpectedly high volume of claims filed in the E&Y Settlement, materially beyond NPT's estimate in its proposal to administer the E&Y Settlement (the "Proposal"), and a corresponding increase in the amount of time required for NPT to administer the settlement, the Ad Hoc Committee seeks an order increasing NPT's fee from \$580.000 to \$1,439,125.00.

The original fee of \$580,000 proposed by NPT and approved by the court was based on an estimate that 18,200 claims would be filed and the E&Y Settlement would take 5,500 hours to administer. The Proposal provided that the Ad Hoc Committee could return to court for authorization of additional fees for NPT if there was a material increase in claims filed in the E&Y Settlement. Such a material increase has occurred, and over 49,625 claims have now been filed (2.73 times greater than anticipated in the Proposal) and NPT expects to expend approximately 12,261 hours administering the settlement (6,761 more hours than contemplated in the Proposal). In the circumstances, class counsel believes that an increase in NPT's fees from \$580,000 to \$1,439,125.00 is fair and reasonable.

### Notice of Motion to Permit Filing of Late Claims

Pursuant to court order, the deadline to file claims in the E&Y Settlement was February 14, 2014. Since that date, NPT has received approximately 1,780 late claims (the "Late Claims"). The Ad Hoc Committee seeks a court order permitting NPT to allow filing of all Late Claims received up until May 11, 2015.

### How to Object to the Motion to Authorize Additional Administrator Fees and to Permit Compensation for Late Claims

If you would like to object to: (a) the motion to authorize additional administration fees; and/or (b) the motion to permit filing of late claims, please email <a href="mailto:siskinds.com">sinoforest@siskinds.com</a> or mail a letter to Siskinds LLP 680 Waterloo Street, PO Box 2520, London, ON N6A 3V8 Attention: Nicole Young and provide (i) your name; (ii) your reason for objecting; (iii) whether or not you intend to appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims (the time and date of which are on the notice of settlement approval, enclosed); (iv) your address for service; and (v) your lawyer's address for service (if applicable).

Your objection must be received by April 1, 2015.

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# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

SISKINDS LLP TO: 680 Waterloo Street PO Box 2520 London, ON N6A 3V8 Attention: Nicole Young Email: sinoforest@siskinds.com RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT (please check all boxes that apply): am a current shareholder of Sino-Forest Corporation am a former shareholder of Sino-Forest Corporation am a current noteholder of Sino-Forest Corporation am a former noteholder of Sino-Forest Corporation 

other (please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

	YOU <u>DO NOT</u> LIKE THE DEALERS DISTRIBUTION PROTOCOL, OR THE
COUNSEL FEE AFFEICATION AND WISH	n 10 Object
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the motion to approve the Dealers Sett	ounsel, and to make submissions at the hearing of lement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: ANN F. MAY	Name:
Address: 25-1880 Snowberry Rd VERNON BG VIH2J5	Address:
Tel.: 250-545-8890	
Fax:	Tel.:
Email: annmay o telus. no t	Fax:
	Email:
Date: March 09, 2015 Sig	mature: May

3311-35 AUE, Vernon BG VIT2TS = 25-1000 Snowberry Rd Vernon BG VIH2JS

# ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

### TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

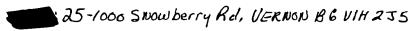
RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

1, <u>U</u>	(insert name) (please check all boxes that apply):
Ø	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)
	, Maringa Manaria

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3311-35 AUE VERNON BG VITATS



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### TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

· / L. O. A. M.

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

1,_	(insert name) (please check an boxes that apply):
	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

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TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

1, Ya	to Farganah Mahmond Moin' (please check all boxes that apply):
	(insert name)
<b>d</b>	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
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	other (please explain)

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	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name:	Parto Forgand Mohamad Mois ss: 77 Denlow Blud	Name:
Addre	ss: 77 Denlow Blud	Address:
	Toconto, ON M3B 1P8	
Tel.: (	116 562 3243	<b>、</b>
Fax:		Tel.:
Email:	mmoinintrogers.com	Fax:
		Email:
Date:	March 20, 2015 Sig	mature: P (a/2am)
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# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8
Attention: Nicole Young
Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

[,_	Estak or Anic Olech (please check all boxes that apply):
	(insert name)
	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)
_	

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

ONLY	<b>SUBMIT</b>	AN	<b>OBJECTION</b>	N IF	YOU	DO	NOT	LIKE	THE	DEA	LERS
SETTL	EMENT,	THE	CLAIMS A	AND	DISTR	IBU1	rion	PROTO	COL,	OR	THE
COUNS	EL FEE A	PPLIC	CATION AND	) WIS	н то о	BJE	CT				

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The properties and be eventual diminer remarked
The proceedings, and he eventual durings remarked to chas remarked to the characteristics
Colonsel tec application.

- I DO NOT intend to appear at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.
- I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.

MY ADDRESS FOR SERVICE IS:

MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):

Name: Walter Burych Name: Walter Burych

Address: 89 Queensway host, #24 Address: 89 Queensway West, #204 Musisdaya, ON, LSB 21/2 MBSTJourga, ON, LSB 21/2

Tel.: 905 896 8600 x. 223

Fax: 403 (96 9757

Tel.: 905 896 8600 eat. 223

Email: Upburyh Chury Wherepes. Com Fax: 905 896 9757

Email: Wpburych @ lough langers. Com

Date: 13/03/15

signature:

# ONLY USE THIS FORM IF YOU **<u>DO NOT</u>** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

. . . 1

680 Waterloo Street PO Box 2520

London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

n

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	White Drych (please check all boxes that apply):
	(insert name) /
☑′	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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COUN	SEL FEE A	PPLIC	CATION AN	D WIS	HTOO	BJECT	Γ				

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The proceedings, and he endual durings removed
to ulas inembers. I object to the educational distrib
Counsel Fee Application.

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**MY ADDRESS FOR SERVICE IS:** 

LAWYER'S **ADDRESS FOR** SERVICE IS (if applicable):

Name: Walter Brych

Name: Walter Burych

Address: 89 Queensway West, #204 Address: 89 Queensway West, #204
Mississaya, ON, LSB 2V2 Mississavan. ON / LR OLD

Miss. ssouga, ON, LSB 2V2

Tel.: 905 696 3600 X. 223

Fax: 403 (76 9757

Tel.: 905 896 8600 ext. 223

Email: WPburyh Chury Whowyass. com

Fax: 405 896 9757

Email: Wp buryet @ buryet langers, com

13/03

Signature

From: maki pochara <makipochara34@hotmail.com>

**Sent:** Monday, March 30, 2015 2:54 PM

To: Sino-Forest

**Subject:** Additional fees Objection

We shareholders have lost so if lawyers/NPT take additional fees 3 times to process more late claims makes no sense. This should be settled with less cost to get some money back to us and not the other way around. They should get more compensation from the defendants to cover their costs or go after Ont. securities or whoever is responsible for not auditing the Company in question. I have lost faith in the market because we do not know what we are investing in. I always thought that the companies are legitimate and what they report is true. Pl. send me only 1 copy. I am also known as Maggie. I am Maki Pochara, 266 Donlands Av. #438, Toronto,On M4J 5B1. When do we get any money? I hate to be in this situation. They had made tons of profits so what happened? Hope it settles soon. Not appearing. Maki

# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,		lease check all boxes that apply):
	(insert name)	
	am a current shareholder of Sino-Forest Co	rporation
	am a former shareholder of Sino-Forest Co	rporation
	am a current noteholder of Sino-Forest Con	poration
	am a former noteholder of Sino-Forest Cor	poration
	other (please explain)	

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ONLY	<b>SUBMIT</b>	AN	<b>OBJECTIO</b>	ON IF	YOU	DO_	<b>NOT</b>	LIKE	THE	DEA	LERS
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COUNSEL FEE APPLICATION AND WISH TO OBJECT											

COUNSELFEE ATTEICATION AND WISE	_
I object to the Dealer	s Settlement the Claims
and distribution protocol should be filed in the E	
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Settlement, the Claims and Distribution understand that my objection will be f	Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
the motion to approve the Dealers Settle	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: HARBHAJAN RANA	Name:
Address: 88 YELLOW AVENS BWO BRAMPTON ION LGROTL	Address:
Tel.: 416-710-4698	
Fax:	Tel.:
Email: mandiprana & Gracil·Com	Fax:
	Email:
Date: MAR 23/2015 Sign	nature: Hubbyasking

# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

SISKINDS LLP

TO:

# 680 Waterloo Street PO Box 2520 London, ON N6A 3V8 Attention: Nicole Young Email: sinoforest@siskinds.com SINO-FOREST CORPORATION — DEALERS SETTLEMENT (please check all boxes that apply): am a current shareholder of Sino-Forest Corporation X am a former shareholder of Sino-Forest Corporation am a current noteholder of Sino-Forest Corporation am a former noteholder of Sino-Forest Corporation other (please explain)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

gr

	DISTRIBUTION PROTOCOL, OR THE
COUNSEL FEE APPLICATION AND WISH	claimed by Siskinds
and Koskie as 1	Feel they are excessive
and include lots -	f duolicative time
1 do not support	the notion to allow (ate
claims or the motion	
NPT as it gove a hind	ing quotation on its fees.
Settlement, the Claims and Distribution understand that my objection will be f	nearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
the motion to approve the Dealers Settl	nunsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: De 12 K Schmick	Name:
Address: 1 Hunter St Enst	Address:
Hamilton, entoin	
Fax: 905 528-8411  Fax: 905 528-9008  Email: schmult da simplen  wigle. com	
Fax: 405 72 1 10 C a(ch	Tel.:
Email: SCh Muel (Cala Simp)	Fax: Email:
wigle: Carr	Email:
Date:F14 27/15 Sig	nature:
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# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

## RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	(please check all boxes that apply):
	(insert name)
ر ۵	am a current shareholder of Sino-Forest Corporation
□ <b>②</b>	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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SETT	Y SUBMIT AN OBJECTION IF LEMENT, THE CLAIMS AND NSEL FEE APPLICATION AND WISI	DISTRIBUTION PROTOCOL, OR THE
		J
	Settlement, the Claims and Distribution understand that my objection will be	Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 15, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers Settl	ounsel, and to make submissions at the hearing of lement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
MY A	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	Robert J Stocks	Name:
Addre	ss: 3 Crancle Daire	Address:
	Trycen, ONT. KRE6, 613) 851-1492	E\$
Tel.:/	613) 851-1492	
		Tel.:
Email	entre C. Fraken. Co.H.	Fax:
		Email:
Date:	March 30/2015 Sig	nature: Steeks

Fasken Martineau DuMoulin LLP Barristers and Solicitors Patent and Trade-mark Agents

333 Bay Street, Suite 2400 Bay Adelaide Centre, Box 20 Toronto, Ontario, Canada M5H 2T6





Dino-Forest Coprater Seculos Clar Claimo Cediminister PO Box 3355 Lordon, ON, NGA 4K3

# ONLY USE THIS FORM IF YOU **<u>DO NOT</u>** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	(please check all boxes that apply):
	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
4	am a former noteholder of Sino-Forest Corporation
	other (please explain)
Pleas	shouldber) and do not want to pursue any further action.
Small	sharelolder) and do not want to pursue any further action.
•	

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MY A	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):			
Name	: Vernon Taskey	Name:			
Addre	: Vernon Taskey :ss: 22 Allisan Place St Albert AB TBN 3A1	Address:			
Tel.:	(740) 458-1824				
Fax:	, ,	Tel.:			
Email:	:	Fax:			
Data	14 MAR 2015	Email: Signature: Washy			

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TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

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		<del></del>	
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MY.	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):	
Nam	e: CONDEX WATTO INC.	Name:	
Addr	ess: 55 MILTON Ave	Address:	
	LACHNE, Quebec		
	HBR ICL		
Tel.:	5144889124	Tcl.:	
Tel.: Fax:	CTU WEE LORG	101	
	574488 1088 1: 1/44770, COM	Fax:	
Fax:			

# ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	Vernon Touley (insert name)	(Please check all boxes that apply):
	am a current shareholder of Sino-Forest	Corporation
	am a former shareholder of Sino-Forest	Corporation
Π,	am a current noteholder of Sino-Forest C	Corporation
	am a former noteholder of Sino-Forest C	Corporation
0	other (please explain)	
Pleas	e remare myself fronthis c	to pursue any further action.
Small	shareholder) and do not want	to pursue any further action.
	-	: Justice Morawetz dated January 29, 2015 (the Dealers Settlement, the claims and distribution

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MY A	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS SERVICE IS (if applicable):	FOR		
Name:	Vernon Taskey	Name:			
Addre	Vernon Taskey ss: 20 Allisan Place St Albert, AB	Address:			
Tel.:	TBN 3A1 (760) 458-1624				
Fax:	(10) 100 100 1	Tel.:			
Email:		Fax:			
		Email:			
Date:	14 MAR 2015	_ Signature: Washy			

Nicole Young	
From: Sent: To: Subject:	qing yu <yu909qing@gmail.com> Friday, February 27, 2015 12:57 PM Nicole Young Re: Sino-Forest Securities Class Action</yu909qing@gmail.com>
To whom it may concern:	
	older of Sino-Forest, object ANY settlement regarding Sino-Forest case, because I court trial, criminal trial, due to the seriousness of the allegations against Sino-
	st Sino-Forest has been ever proven. For reasons and facts, I believe that Muddy tions against Sino-Forest are groundless.
If Sino-Forest owned all the t	rees it claimed, those trees should still belong to us current stock-holders.
Best regards,	
Qing Yu	
On Fri, Feb 27, 2015 at 9:11	AM, Nicole Young <nicole.young@siskinds.com> wrote:</nicole.young@siskinds.com>
Dear Sir/Madam:	
•	ed Siskinds LLP in connection with the Sino-Forest Class Action. There have been Attached please find a Notice of Proposed Settlement, Objection Form and a E&Y Settlement.
Please review the Notices car	efully as your rights may be affected.
Kind regards,	

Nicole Young

Law Clerk

Siskinds LLP

680 Waterloo Street

London, ON N6A 3V8

Tel: (519) 672-2251 x2380

Fax: (519) 672-6065

Mail: nicole.young@siskinds.com

Web: www.siskinds.com

Follow us on www.twitter.com/siskindsllp

Stay Connected:



## Please consider the environment before printing this email

This message contains confidential information and is intended only for <a href="mailto:yu909qing@gmail.com">yu909qing@gmail.com</a>. If you are not <a href="mailto:yu909qing@gmail.com">yu909qing@gmail.com</a> you should not disseminate, distribute, print or copy this e-mail. Please notify <a href="mailto:nicole.young@siskinds.com">nicole.young@siskinds.com</a> immediately by e-mail if you have received this e-mail in error and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Neither Siskinds LLP nor the sender <a href="mailto:nicole.young@siskinds.com">nicole.young@siskinds.com</a> accepts liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

Qing Yu

### **ROBERT WONG**

Legal fees and settlement Legal fees.xls

		Canadian portion	Canadian fees	
		portion	1662	
Dealer	settlement	90%	requested	
settlement	\$32,500,000	\$29,250,000	\$5,517,207	This sum is too high
Horsley				
settlement E&Y	\$4,200,000	\$3,780,000	\$567,000	
settlement	\$117,000,000	\$105,300,000	\$17,846,250	
Poyry				
settlement	\$0	\$0 \$138,330,000	\$0 \$23,930,457	

The first page of fee retainer agreement listed all the individual defendants including E&Y,Poyry,Sino-Forest senior officers (that include Horsely), and the dealers. Section 11 (b) shows the fee payment for prosecuting all those listed above. Based on the section above, the fees for recovery of \$ 138.33 million is \$19.83 millions. Since the Poyry settlement provided no recovery, the certification for that settlement is not counted as certification towards fee calculation for the other settlements, fee calculation remained to be based on pre certification level.

### Legal fees based on retainer agreement

	First \$20 million of any recovery	between \$20millions	portion of recovery between \$40millions & \$60 millions	portion of recovery in excess of \$60millions	
settlement before certification	20 million 25%	20 million 20%	20 million 15%	78.33 million 10%	total due
Fees due, million	\$5.0000	\$4.0000	\$3.0000	\$7.8330	\$19.8330
Fees already paid,\$million (Horsely & E&Y settlement)					\$18.4133
Remaining fees due, for dealer settlement, \$million \$1.4					\$1.4198

Fees for the dealer settlement should be \$1.5 millions only.

Alternative calculation is based on 10% of current recovery of \$29,250,000. The fees comes to \$2,925,000



### CONTINGENCY FEE RETAINER AGREEMENT

BETWEEN:

### ROBERT WONG

herein called the "Client" OF THE FIRST PART

- and -

### SISKINDS LLP and KOSKIE MINSKY LLP

herein called the "Class Counsel"
OF THE SECOND PART

Proceeding under the Class Proceedings Act. 1992

### RECITALS

Robert Wong (the "Client") hereby retains Siskinds LLP and Koskie Minsky LLP to commence an action against Sino-Forest Corporation, Ernst & Young LLP, Pöyry (Beijing) Consulting Company Limited, Credit Suisse Securities (Canada), Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd., Maison Placements Canada Inc., Banc of America Securities LLC, Credit Suisse (USA) Inc., Credit Suisse Securities (USA) LLC, Haywood Securities Inc., Merrill Lynch, Pierce, Fenner & Smith Incorporated, UBS Securities Canada Inc., certain of Sino-Forest's senior officers or directors and any other parties who may have potential liability in respect of Sino-Forest's public disclosure, to seek to have such action certified as a class proceeding, and to take all necessary steps to prosecute the action.

The Client acknowledges and understands that Class Counsel will be paid fees in the Action (defined below) only in the event of success. The Client's agreement with Class Counsel in respect of class counsel fees and disbursements is set out below, and the Client understands that the agreement shall not have any force and effect, unless approved by the Superior Court of Justice pursuant to the Class Proceedings Act, 1992.

disbursements, applicable taxes and any interest payable thereon and any other amount paid by the Defendants as costs. Class Counsel are authorized to settle the amount of costs awarded on any motion, appeals or the trial of the Common Issues.

- 10. Except for any costs paid to Class Counsel as provided in paragraph 9 above, Class Counsel shall only be paid its fees upon achieving Success in the Action, whether by obtaining judgment on any of the Common Issues in favour of some or all Class members or by obtaining a settlement that benefits one or more of the Class members. The fees shall be paid by a lump sum payment to the extent possible, or (if a lump sum payment is not possible) by periodic payments, out of the proceeds of any judgment, order or settlement awarding or providing monetary relief, damages, interest or costs to the Class or any Class member.
- 11. In the event of Success, Class Counsel shall be paid an amount equal to
  - (a) any disbursements not already paid to Class Counsel by the Defendants as costs plus applicable taxes and interest thereon in accordance with s. 33(7)(c) of the Act; plus
  - (b) an amount equal to a percentage of Recovery plus Harmonized Sales Tax (HST) where the applicable percentage rate shall be as follows:

	For the first \$20 million of any Recovery	For the portion of the Recovery between \$20 million and \$40 million	For the portion of the Recovery between \$40 million and \$60 million	For the partion of the Recovery in excess of \$60 million
If the Action is settled or there is judgment before the Court renders a decision on a certification motion	twenty-five percent (25%)	twenty percent (20%)	fifteen percent (15%)	ten percent (10%)
If the Action is settled or there is judgment after the Court renders a decision on a certification motion and before the commencement of the Common Issues trial;	twenty-seven and a balf percent (27.5%)	twenty-two and a half percent (22.5%)	seventeen and a half percent (17.5%)	tweive and a haif 'percent (12.5%)
If the Action is settled after the commencement of the Common Issues	thirty percent (30.0%)	twenty-five percent	twenty percent (20.0%)	fifteen percent (15.0%)

- 6. Non-Canadian primary market note purchases (2013, 2014, and 2016 Notes) if no CCAA claim filed
- 101. Claims for purchases by notes in the 2013, 2014, and 2016 Note Offerings by non-Canadians and individuals or entities who purchased in a distribution outside of Canada have a risk factor of 0.01. These claims may be found to be outside of the Ontario, Quebec or US Class Actions class definitions, and a claimant may face the claims bar unless there was an individual CCAA proof of claim filed. These claims are assigned a risk adjustment factor of 0.01.

### T. SUPPORT OF THE CLAIMS AND DISTRIBUTION PROTOCOL

- 102. I am advised by Jonathan Ptak of Koskie Minsky that the trustees of the Labourers Fund and the OE Fund support the Dealers Settlement and have instructed Class Counsel to seek approval of the Claims and Distribution Protocol.
- 103. I am advised by Daniel Bach and Serge Kalloghlian of Siskinds LLP that David Grant, AP7 and Davis support the proposed Claims and Distribution Protocol and have instructed Class Counsel to seek approval of it. Robert Wong has indicated that he has the following objection to the proposed Claims and Distribution Protocol: "With respect to claims in the underwriter settlement, the Administrator should not have the discretion to accept late claims. Instead, Court approval should be required."

### U. SCOPE OF CLAIMS PROCESS

104. The claims administrator will review claims pursuant to the above protocol and determine a claimant's share of the net settlement fund. Claims assessed at less than \$5 will not be paid out as it will likely cost more than \$5 to process and pay such claims.

This is Exhibit "B" referred to in the Affidavit of Heather Palmer sworn before me, this 23<sup>rd</sup> day of April, 2015

A COMMISSIONER FOR TAKING AFFIDAVITS, ETC.

# ONLY USE THIS FORM IF YOU **<u>DO NOT</u>** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	IGNIT STETSKO (please check all boxes that apply):			
Ø	am a current shareholder of Sino-Forest Corporation			
	am a former shareholder of Sino-Forest Corporation			
	am a current noteholder of Sino-Forest Corporation			
	am a former noteholder of Sino-Forest Corporation			
	other (please explain)			

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

ONLY SUBMIT AN OBJECTION IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROTOCOL, OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

COUNSEE FEE MIT EXCATION MID WAS	1 TO ODGECT			
I object to late Claims	being accepted is. NPT's			
Lobjer to late Claims fee increase from \$580,000 1	0 1, +39,125 Practically tripples			
if this portiones there we	a timely bosis.			
<u> </u>				
<del></del>				
Settlement, the Claims and Distribution understand that my objection will be a	nearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 15, at 330 University Ave., 8th Floor Toronto,			
the motion to approve the Dealers Settl	the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th			
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):			
Name: IGNIT STETSKO	Name:			
Address: 2202 Burkes Road Gornam ON. PGG 084	Address:			
Tel.: 607-767-3363				
Fax: Aignit, Stetsko @Gmo: 1. Com	Tel.:			
Email:	Fax:			
	Email:			

Date: April 16, 2015 Signature: Signature: Statisho

From:

George < george\_charocopos@hotmail.com>

Sent:

Thursday, February 26, 2015 7:54 AM

To:

Sino-Forest

Subject:

Attn: Nicole Young

Hello,

I would like to object to permitting the late filing of claims.

- 1)George Charocopos
- 2) I am objecting as there was an additional filing deadline. The time taken the administrator has been much longer than anticipated. They are now requesting more time to complete the work and more money. Allowing "late claims" will just further hinder the process and cost more money in doing so. Therefore reducing the amount of money to be paid to claimants that filed by the original deadline.
- 3) I will attend court I have to file this motion
- 4) 2 Neapolitan Drive, Toronto, ON, M1P4B1

Regards,

George Charocopos 4169389029

# ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ONN6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

I,	BETTY FAY	(please check all boxes that apply):		
	(insert name)			
	am a current shareholder of Sino-Fores	st Corporation		
Ø	am a former shareholder of Sino-Fores	t Corporation		
	am a current noteholder of Sino-Forest Corporation			
	am a former noteholder of Sino-Forest	Corporation		
	other (please explain)			

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Cashart (the possibilities / probabilities of exceeding the claims whould have been addressed). At the stage the claim is now at a spreadhest should do the majority of work, hering in of the data being the claims. As outh, I strongly disagree with an increase of 148%. Poor planning on the part of NPT should not result in further funds being denied to the should dessert the claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the

motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto,

I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.

**MY ADDRESS FOR SERVICE IS:** 

MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):

Name: BETTY FAY

Ontario.

Name:

Address: 6102 THW AITE CRES

Address:

PEACHLAND, BC

CAMMON

Tel.: 250 - 317 - 1573

Fax:

Tel.:

Email: betty fay@ymail. com

Fax:

Email:

Date: MARCH " 2015

Signature

From:

real danjou <danjou.com@hotmail.com>

Sent:

Wednesday, March 18, 2015 12:45 PM

To:

Sino-Forest; real danjou

Subject:

Opposition

<u>Bonjour Mme. Nicole Young</u>, la présente est pour vous signifier <u>mon profond désaccord sur la motion</u> <u>visant à autoriser des frais supplémentaires d'administration et de comptables</u> pour les motifs suivants :

- A) Je considère ces frais injustes et non équitables ,comparativement à la perte de mes économies gagnées péniblement à la sueur de mon front que j'ai investi dans cette compagnie qui s'en est appropriées de façon très douteuse.
- B) Je n'ai pas l'intention d'assister à l'audience. ( J'ai suffisamment perdu de mes économies). Merci.
- C) Réal d'Anjou: 2777 ch. Georgeville Magog P.Q. J1X 0M8; tel: 819-847-2388; courriel: danjou.com@Hotmail.com)

# ONLY USE THIS FORM IF YOU <u>DO NOT</u> LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

### RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

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☐ am a current shareholder of Sino-Forest Corporation					
F	攵	am a former shareholder of Sino-Forest Corporation			
		am a current noteholder of Sino-Forest Corporation			
		am a former noteholder of Sino-Forest Corporation			
		other (please explain)			
×	MA	YBE I AM A CURRENT SHAREHOLDER SINCE I HAD			

4400 SHARES AND HAVE NEVER SOLD THEY BECAUSE THEY ARE

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ONLY SUBMIT AN OBJECTION IF YOU DO NOT LIKE THE DEALERS SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROTOCOL, OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

I OBJECT TO NPT RICE POINT ASKING FOR 248 % MORE THAN THEIR ESTIMATE OF 8 580,000.00 . THEY ESTIMATED POORLY AND THEIR COST PER CLAIM SHOULD DECREASE (FROM EFFICIENCY HE THE NUMBER OF CLAIMS INCREASES. CLOSING DATE OBJECT TO PODITIONAL CLAIMS BEING PERMITTED AFTER THE TO THE EXTENT OF 1785 LATE CLAIMS. WHAT IS A CLOSINO DATE FOR ?

SINCE WASTEFUL I FIND THE CLAIMS ADMINISTRATERS VERY MAILINGS OF THIS NOTICE AT A MAILING COST NOT TO MENTION THE PERSON/TIME. THE ADMINISTRATERS ACT LIKE THEY ARE SITTING ON THE GOLDEN EGGS WHICH CAN BE UPON TO PAY ANY AMOUNT.

- M I DO NOT intend to appear at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.
- I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto, Ontario.

MY ADDRESS FOR SERVICE IS:

LAWYER'S **ADDRESS** FOR **SERVICE IS (if applicable):** 

Name: PETER G. FINLAYSON

Name:

Address: 1066 ROUTE 138A

Address:

ORMSTOWN, QUEBEC

JOS 1KO

Tel.: 450-829-2402

Fax:

Tel.:

Email:

Fax:

Email:

ety G. Finloyson Date: March 12/2015 Signature:

To

SISKINDS LLP 680 Waterloo Street, PO Box 2520. London, ON N6A 3V8

**Attention: Nicole Young** 

Email sinoforest@siskinds.com

**RE: NOTICE OF OBJECTION** 

I would like to object to

- a) the motion to authorize additional administration fees; and/or
- b) the motion to permit filing of late claims

## Reason for objection:

Court order indicated the deadline to file claims was February 14, 2014. Late claims was not approved by court and I have strong objection to this late claims issue as this would have negative impact on my returns

I DO NOT intend to appear at the hearing of the motion to authorize additional administration fees and /or b. the motion to permit filing of late claims

MY ADDRESS FOR SERVICE IS: MY LAWYERS ADDRESS FOR SERVICE IS

Name: VEERA NARAYANA **GUNDAPANENI** 

Name:

Address: 86, GIBBS STREET Address:

Sault Ste. Marie, Ontario

P6A 5H4

905 867 7331 Tel:

Tel:

Fax: 705 945 2908

Fax

Email: Veera12345@live.ca

**Email** 

Date: March 30, 2015

Signature:

NOT PRPLICABLE

From:

mike kazarian <mikekazarian@hotmail.com>

Sent:

Friday, February 27, 2015 12:28 PM

To:

Nicole Young

Subject:

**RE: Sino-Forest Securities Class Action** 

Hi Nicole,

I wish to object to the late claims request.

There was sufficient amount of time for Sino Forest shareholders to submit their claims as most did. For those that did not follow the claim procedure their claims should not be allowed.

I will not attend the hearing.

**Thanks** 

Mike Kazarian

From: nicole.young@siskinds.com
To: nicole.young@siskinds.com

Subject: Sino-Forest Securities Class Action Date: Fri, 27 Feb 2015 17:11:05 +0000

Dear Sir/Madam:

You have previously contacted Siskinds LLP in connection with the Sino-Forest Class Action. There have been developments in this action. Attached please find a Notice of Proposed Settlement, Objection Form and a Notice in connection with the E&Y Settlement.

Please review the Notices carefully as your rights may be affected.

Kind regards,

Nicole Young Law Clerk Siskinds LLP 680 Waterloo Street London, ON N6A 3V8

Tel: (519) 672-2251 x2380

Fax: (519) 672-6065

Mail: nicole.young@siskinds.com

Web: www.siskinds.com

Follow us on www.twitter.com/siskindsllp

Stay Connected:



## Please consider the environment before printing this email

This message contains confidential information and is intended only for mikekazarian@hotmail.com. If you are not mikekazarian@hotmail.com you should not disseminate, distribute, print or copy this e-mail. Please notify nicole.young@siskinds.com immediately by e-mail if you have received this e-mail in error and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Neither Siskinds LLP nor the sender nicole.young@siskinds.com accepts liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

From: shemina@roxny.com

**Sent:** Thursday, March 05, 2015 12:03 PM

To: Sino-Forest

Subject: Motion to authorize addition fees - objection

Dear Sirs,

Re: Motion to authorize additional administration fees

(i) Name: Shemina Keshvani

(ii) I object to increasing the administrative fees for the following reasons:

- a. Siskinds LLP was aware of the potential for increased hours administering the settlement when the initial fee was proposed. The potential for increase was taken into account when the initial fee was set. Any revision would have to minimal.
- b. There are any number of class action firms that would complete the work effectively for the original fee.
- c. The fee increase is anything but reasonable and fair as it amounts to a 148% increase of the original fee. Any increase would have to be minimal.
- d. The claimants have already been violated and misled by Sino-Forrest. It would cause undue burden and further humiliation for the courts to permit our representation Siskinds LLP to take advantage of our weak position and effectively extort additional funds.
- e. The settlement is already meagre and there will little left to disburse to the plaintiffs.
- (iii) I do not intend to appear at the hearing.
- (iv) Address: Shemina Keshvani, 39 Lessard Ave, Toronto, ON, M6S 1X6
- (v) N/A

Regards,

Shemina Keshvani

From:

shemina@roxny.com

Sent:

Thursday, March 05, 2015 12:12 PM

To:

Sino-Forest

Subject:

Motion to permit filing of late claims - objection

Dear Sirs,

Re: Motion to permit filing of late claims

(i) Name: Shemina Keshvani

(ii) I object to the filing of late claims for the following reasons:

- a. Siskinds LLP had access to contact information for all the potentially parties effected by a class action suit against Sin-Forrest. There was sufficient time in the initial filing period to reach potential plaintiffs.
- b. Plaintiffs that were negligent to file during the filing period had sufficient opportunity as a there was already a generous filing period.
- c. The addition of 18,200 claims would reduce the disbursement of a settlement to effectively \$0. If more plaintiff are added to the suit, then the amount of restitution should be increased in-kind.
- d. Siskinds LLP have also requested to increase their share/fee of the settlement. If granted, the increased fee would absorb a significant portion of the settlement leaving an even smaller amount for disbursement to the initially filers.
- e. The initials plaintiffs that filed during the filing period should not be penalized as a result of late filings.
- (iii) I do not intend to appear at the hearing.
- (iv) Address: Shemina Keshvani, 39 Lessard Ave, Toronto, ON, M6S 1X6
- (v) N/A

Shemina Keshvani

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

## 

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

COU	NSEL FEE APPLICATION AND WISI	
<u>Ŧ</u>	LEASE SEE ATTACHED	LETTER-
10/	Settlement, the Claims and Distribution understand that my objection will be it	Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 15, at 330 University Ave., 8th Floor Toronto,
	Ontario.	
	I DO intend to appear, in person or by co the motion to approve the Dealers Settl	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
	I DO intend to appear, in person or by co the motion to approve the Dealers Settl the Counsel Fee Application, at 10:00 a.	ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th  MY LAWYER'S ADDRESS FOR
MY A	I DO intend to appear, in person or by co the motion to approve the Dealers Settl the Counsel Fee Application, at 10:00 at Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  BAKBARA A. KNOBLAUCH  : KEUIN H. KNOBLAUCH	ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th
MY A	I DO intend to appear, in person or by co the motion to approve the Dealers Settl the Counsel Fee Application, at 10:00 at Floor Toronto, Ontario.	ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th  MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
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MY A Name Addre	I DO intend to appear, in person or by conthe motion to approve the Dealers Settle the Counsel Fee Application, at 10:00 and Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  BAKBARA A. KNOBLAUCH: KEUIN H. KNOBLAUCH ess: 10 40 - 102 md AUE.  IG 2B8 DAWSON CREEK, B.C.	ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th  MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):  Name:
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MY A	I DO intend to appear, in person or by co the motion to approve the Dealers Settl the Counsel Fee Application, at 10:00 a. Floor Toronto, Ontario.  ADDRESS FOR SERVICE IS:  BAKBARA A. KNOBLAUCH  EKEVIN H. KNOBLAUCH  ESS: 1040-102md AUE.  IG 2B8 DAWSON CREEK, B.C.  250-806-0046  N/A.  N/A.	ement, the Claims and Distribution Protocol, or .m. on May 11, 2015, at 330 University Ave., 8th  MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):  Name:  Address:

Kevin & Barbara Knoblauch 1040-102 Ave., V1G 2B8 Dawson Creek, B.C.

March 15, 2015

Sino-Forest Securities Class Action Notice Administrator P.O. Box 3355 N6A 4K3 London, Ontario

Siskinds LLP 680 Waterloo Street, P.O. Box 2520 London ON N6A 3V8

**Attention Nicole Young** 

The claimants Kevin and Barbara Knoblauch object to the request for increased Administration costs paid for from disbursements to claimants. All these should be paid by the broker/dealers/banks, not the class action claimants.

We object to any settlement on behalf of the brokers/dealers/banks that does not include full re-imbursement with interest to us for our Sino Forest loss.

We remember distinctly being given glowing official reports by T.D. Waterhouse, as they in fact dumped their shares onto unsuspecting clients like us, in full knowledge of the coming downgrades for Sino-Forest. Sino-Forest went from a "top pick" report on their official website, by T.D. Waterhouse Analysts, to a non existent report about the day after I was lied to by a T.D. Waterhouse representative on the phone. We would never have bought this company if T.D. Waterhouse had been in full disclosure about Sino-Forest.

It is our contention that late claims are late because they were informed late by their broker/dealer, holding back mailouts as their lawyers scrambled about how to cover. We want all our money back from T.D. Waterhouse, so must object to late filings and the proposed \$32,500,000 settlement. Banks and their Trading Divisions and Companies have a duty to be honest with their clients.

We require full Dealer/Broker responsibility. Of course our interest in "direct investing" was seriously undermined, so we also claim loss of opportunity should apply to all class action claimants who were also duped like us. Please register our claim of loss of opportunity with the court. We would appreciate your filing this letter of objection before the Hearing, as we will not be in attendance.

Sincerely,

My Galland Frolland

Kevin and Barbara Knoblauch

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street

PO Box 2520

London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

## RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	Joits Kecocic (please check all boxes that apply):
_	(moore manie)
6	am a current shareholder of Sino-Forest Corporation
	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
	other (please explain)

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ONLY SUBMIT AN OBJECTION IF SETTLEMENT, THE CLAIMS AND I COUNSEL FEE APPLICATION AND WISH	
17/8 PROCEEDINGS ARE	TO DECERMINE
BENEFITS DUE TO THE	E CORPORATE
LECTION. THE Chains	ACENTRAT EPNST AND
GOUING SHOUND BE PI	716 BY ERNST 7
young AND ARE NO	OT TO BE REDUCED
FROM THE SETTLE MI	ENT AS APPROVED.
NPT IS NOT ETIMES TO	ASDITIONAL COMPENSATION
Settlement, the Claims and Distribution understand that my objection will be f	earing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I iled with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
the motion to approve the Dealers Settle	unsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: JOHN KELLOCK	Name:
Address: 13 RIVER ST	Address:
GRAND BAY- WESTFIELD NEW BRUN FWICK ESKZ	T/
Fax:	Tel.:
Email: John (c 288@ hofnoil	Fax:
0	Email:
Date: Mau 8 2015 Sign	nature: Julloe 1

From:

Healthway Market <fiziks@shawbiz.ca>

Sent:

Friday, February 27, 2015 2:22 PM

To:

Sino-Forest

Subject:

Attention: Nicole Young - OBJECTION TO THE MOTION TO AUTHORIZE ADDITIONAL

ADMINISTRATOR FEES AND TO PERMIT COMPENSATION FOR LATE CLAIMS

2-27-2015 A.D.

**NOTICE** 

Dear Mrs Young,

My name is Randyll Newsham, I owned 2000 Sino-Forest shares. I will accept \$6,000.00 (SIX THOUSAND DOLLARS US) compensation, to withdraw these objections.

I object to the motion to authorize additional administrator fee's and to permit compensation for late claims.

It is not fair to me and others who filed their claims on time to have to share what little money is left for shareholders to spit, to allow others who did not.

I do not consent to additional fee's being charged for any reason, especially the almost tripling of the fee.

I will try to be there in person to represent myself as a natural man, in common law.

Yours Truly,

Randyll Newsham, private person C/o 32678 Geneva Ave. Abbotsford, B.C. V2T 3X9

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## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,_	NIRMAL S. PAGECY (ple: (insert name)	ase check all boxes that apply):
<b>19</b>	am a current shareholder of Sino–Forest Corp	oration
	am a former shareholder of Sino-Forest Corp	oration
	am a current noteholder of Sino-Forest Corpo	pration
	am a former noteholder of Sino-Forest Corpo	ration
	other (please explain)	

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

SETT	FLEMENT, THE CLAIMS AND NSEL FEE APPLICATION AND WISI	
by a	le all had an offort  Feb 14/2014 and the  pfly on that dale  my forth coming  my more money spo	cose people who dick not should be exempt from monies. I disagree with
<b></b>	Settlement, the Claims and Distribution understand that my objection will be f	nearing of the motion to approve the Dealers Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the 5, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers Settle	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY A	ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	: NIRMAL S. PAGELY	Name:
Addre	ess: 9440 BOTHWELL DR.	Address:
	SURREY, B.C. V4NGG9	
Tel.:	604-589-2068	
Fax:		Tel.:

Date: March 12/2015 Signature: Nicomal S. Copply

Fax:

Email:

Email:

From:

maki pochara <makipochara34@hotmail.com>

Sent:

Monday, March 30, 2015 2:54 PM

To:

Sino-Forest

Subject:

Additional fees Objection

We shareholders have lost so if lawyers/NPT take additional fees 3 times to process more late claims makes no sense. This should be settled with less cost to get some money back to us and not the other way around. They should get more compensation from the defendants to cover their costs or go after Ont. securities or whoever is responsible for not auditing the Company in question. I have lost faith in the market because we do not know what we are investing in. I always thought that the companies are legitimate and what they report is true. Pl. send me only 1 copy. I am also known as Maggie. I am Maki Pochara, 266 Donlands Av. #438, Toronto,On M4J 5B1. When do we get any money? I hate to be in this situation. They had made tons of profits so what happened? Hope it settles soon. Not appearing. Maki

From: Steve Pozgaj <steve.pozgaj@sympatico.ca>

Sent: Friday, February 27, 2015 3:42 PM

To: Sino-Forest

Subject: Objection to the motion to permit filing of late claims in the Sino-Forest Securities

Litigation

Further to the court approved notice of objection posted

at <a href="http://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">http://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="http://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">http://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.kmlaw.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf</a> and cited below, I wish to state <a href="https://www.ca/site\_documents/111100\_NoticeandObjection\_25feb15.pdf">https://www.ca/site

As to the information you require in support of my strong objection to any late filing of claims being accepted:

(i) your name

Stephen Pozgaj

(ii) your reason for objecting

Stated above.

(iii) whether or not you intend to appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims (the time and date of which are on the notice of settlement approval, enclosed)

As of this date of sending this email, I am uncertain as to whether or not I intend to attend the hearing at the Canada Life Building, 330 University Avenue, 8th Floor, Toronto, Ontario.

(iv) your address for service

1583 Lovelady Cres, Mississauga, ON L4W 2Y9

(v) your lawyer's address for service (if applicable)
Not applicable.

### With respect.

Steve Pozgaj / Zoralot / steve.pozgaj@sympatico.ca / (416) 605-6210 / "Technology strategy, with business sense" TM Only two things are infinite, the universe and human stupidity, and I'm not sure about the former. — Albert Einstein

## SINO-FOREST SECURITIES LITIGATION

## NOTICE OF PROPOSED SETTLEMENT WITH:

Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc.,

## Canaccord Financial Ltd., Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith Incorporated (successor by merger to Banc of America Securities LLC)

TO: All persons and entities, wherever they may reside, who acquired any securities of Sino-Forest Corporation including securities acquired in the primary, secondary, and over-the-counter markets (the "Securities Claimants").

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.

YOU MAY NEED TO TAKE PROMPT ACTION

### IMPORTANT DEADLINES

Objection Deadlines (for those who wish to object or make submissions regarding the proposed settlements with the Dealers or recognition and enforcement of any order approving such proposed settlements in the United States. See pages 3 & 4 for more details)

April 1, 2015 (Ontario

Superior Court); and

May 29, 2015 (United

**States Bankruptcy Court)** 

## Background of Sino-Forest Class Action and CCAA Proceeding

In June and July of 2011, class actions were commenced in the Ontario Superior Court of Justice (the "Ontario Proceeding") and the Quebec Superior Court (the "Quebec Proceeding") by certain plaintiffs (the "Canadian Plaintiffs") against Sino-Forest Corporation ("Sino-Forest"), its auditors, a consulting company, its senior officers and

directors, Credit Suisse Securities (Canada) Inc., TD Securities Inc., Dundee Securities Corporation, RBC Dominion

Securities Inc., Scotia Capital Inc., CIBC World Markets Inc., Merrill Lynch Canada Inc., Canaccord Financial Ltd.,

Maison Placements Canada Inc., Credit Suisse Securities (USA) LLC and Merrill Lynch, Pierce, Fenner & Smith

Incorporated (successor by merger to Banc of America Securities LLC) (the "Dealers"). In January 2012, a proposed

class action was commenced by certain plaintiffs (together with Canadian Plaintiffs, the "Plaintiffs") against Sino-

Forest and other defendants in the Supreme Court of the State of New York which was removed to and is now pending

in the United States District Court for the Southern District of New York (the "U.S. Action") (together with the

Ontario Proceeding and the Québec Proceeding, the "Proceedings"). The Proceedings alleged, inter alia, that the

public filings of Sino-Forest contained false and misleading statements about Sino-Forest's financial results, assets,

business, and transactions.

Since that time, the litigation has been vigorously contested. On March 30, 2012, Sino-Forest obtained creditor

protection under the Companies' Creditors Arrangement Act (the "CCAA"), and the Ontario Superior Court ordered a

stay of proceedings against the company and other parties (the "CCAA Proceeding"). Orders and other materials

relevant to the CCAA Proceeding can be found at the CCAA Monitor's website at

http://cfcanada.fticonsulting.com/sfc/ (the "Monitor's Website").

On December 10, 2012, the Ontario Superior Court entered an order (the "Plan Sanction Order") approving a Plan of

Arrangement in the CCAA Proceeding. As part of the Plan of Arrangement, the court approved a framework by which

the Plaintiffs may enter into settlement agreements with any of the third-party defendants to the Proceedings.

On February 4, 2013, a proceeding was commenced in the United States Bankruptcy Court for the Southern District of

New York (the "United States Bankruptcy Court") captioned In re Sino Forest Corporation, Case No. 13-10361 (MG)

(the "Chapter 15 Proceeding") seeking recognition of the CCAA Proceeding and an order recognizing and enforcing

the Plan Sanction Order in the United States. On April 15, 2013, the United States Bankruptcy Court entered an order

recognizing and enforcing the Plan Sanction Order in the United States.

Shortly prior to the commencement of the CCAA Proceeding, the Plaintiffs entered into a settlement agreement with

Pöyry (Beijing) Consulting Company Limited (the "Pöyry Settlement"). The Pöyry Settlement was approved by courts

in Ontario and Québec, and January 15, 2013 was fixed as the date by which members of the class could opt of the

Proceedings. The opt out period has now expired. No person may now opt out of the Proceedings.

To date, the claims in the Proceedings against the defendants Ernst & Young and David J. Horsley have also been

settled and approved by the Ontario Superior Court. Those settlements have been recognized by the United States

Bankruptcy Court in the Chapter 15 Proceeding.

On January 12, 2015, the Ontario Superior Court certified the Ontario Proceeding and granted leave to the Plaintiffs to

pursue claims made pursuant to Part XXIII.1 of the Ontario Securities Act (and equivalent legislation in other

Provinces) as against Sino-Forest, BDO Limited, Allen T.Y. Chan, W. Judson Martin, Kai Kit Poon, William E.

Ardell, James P. Bowland, James M.E. Hyde, Edmund Mak, Simon Murray, Peter Wang, and Garry J. West.

## Who Acts for the Securities Claimants

Koskie Minsky LLP, Siskinds LLP, Siskinds Desmeules, sencrl, and Cohen Milstein Sellers & Toll PLLC

(collectively, "Class Counsel") represent the Securities Claimants in the Proceedings. If you want to be represented by

another lawyer, you may hire one to appear in court for you at your own expense.

You will not have to directly pay any fees or expenses to Class Counsel. However, Class Counsel will seek to have

their fees and expenses paid from any money obtained for the class or paid separately by the defendants.

## **Proposed Settlement with the Dealers**

The Plaintiffs have entered into a proposed settlement with the Dealers (the "Settlement Agreement"). The Settlement

Agreement would settle, extinguish and bar all claims, globally, against the Dealers in relation to Sino-Forest including

the allegations in the Proceedings. The Dealers do not admit to any wrongdoing or liability. The terms of the

proposed settlements do not involve the resolution of any claims against Sino-Forest or any of the other remaining

defendants. For an update on CCAA orders affecting Sino-Forest, please see the Monitor's Website. A complete copy

of the proposed Settlement Agreement and other information about these Proceedings is available on the website of

Koskie Minsky LLP, at www.kmlaw.ca/sinoforestclassaction, on the website of Cohen Milstein Sellers & Toll PLLC

at http://www.cohenmilstein.com/cases/274/sino-forest ("Cohen Milstein Website") and on www.sinosettlement.com

(collectively, the "Class Action Websites").

The Settlement Agreement, if approved and its conditions fulfilled, provides that CAD\$32,500,000 (the "Settlement

Amount") shall be paid into an interest bearing account for the benefit of the Securities Claimants until such time that

it is distributed pursuant to orders of the Ontario Superior Court and to pay legal fees and disbursements.

In return, the Proceedings will be dismissed against the Dealers, and there will be an order forever barring all claims

against them in relation to Sino-Forest, including any allegations relating to the Proceedings. Such order will be final

and binding and there will be no ability to pursue a claim against the Dealers through an opt-out process under class

proceedings or similar legislation.

The proposed settlement with the Dealers is subject to court approval, as discussed below.

Hearing to Approve the Settlement Agreement, Class Counsel Fees, and the Claims and Distribution Protocol

## on May 11, 2015 in Toronto, Ontario

On May 11, 2015 at 10:00 a.m. (ET), there will be a hearing before the Ontario Superior Court of Justice at which

Class Counsel will seek that Court's approval of i) the Settlement Agreement; ii) the fees and expense reimbursement

requests of Class Counsel; and iii) a plan of allocation and distribution of the Settlement Amount (the "Claims and

Distribution Protocol") (together, the "Ontario Approval Motion"). The hearing will be held at the Canada Life

Building, 330 University Avenue, 8th Floor, Toronto, Ontario. The exact courtroom number will be available on a

notice board on the 8th Floor.

- 3 -

The proposed Claims and Distribution Protocol sets out, among other things, i) the method by which the Administrator

(defined below) will review and process claims forms; and ii) the method by which the Administrator will calculate the

amount of compensation to be distributed to each Securities Claimant, including the Allocation System, which assigns

different risk adjustment factors to different Sino-Forest securities depending on factors such as the type of security

acquired and the time that security was acquired. Persons that suffered the same loss on their Sino-Forest securities

may receive different levels of compensation, depending on the risk adjustment factors assigned to their securities.

The detailed proposed Claims and Distribution Protocol can be found at the Class Action Websites, or by contacting

Class Counsel at the contact information set out at the end of this notice.

At the Ontario Approval Motion, the court will determine whether the Settlement Agreement and the Claims and

Distribution Protocol are fair, reasonable, and in the best interests of Securities Claimants. At that hearing, Class

Counsel will also seek court approval of its request for fees and expense reimbursements ("Class Counsel Fees"). As is

customary in class actions, Class Counsel is prosecuting and will continue to prosecute this class action on a contingent fee basis. Class Counsel is paid only where there is recovery for the class, and Class Counsel funds the outof-

pocket expenses of conducting the litigation in the interim. Class Counsel will be requesting the following fees and

disbursements to be deducted from the Settlement Amount before it is distributed to Securities Claimants:

Siskinds LLP, Koskie Minsky LLP, Siskinds Desmeules, sencrl

Amount requested: up to \$5,517,207 plus disbursements (expenses), plus taxes

Cohen Milstein Sellers & Toll PLLC

Amount requested: \$194,620 plus disbursements (expenses), plus taxes

The court materials in support of these fee and disbursement requests will be posted on the Class Action Websites

prior to the Distribution Protocol and Fee Hearing.

Expenses incurred or payable relating to notification, implementation, and administration of the settlement ("Administration Expenses") will also be paid from the Settlement Amount.

All Securities Claimants may attend the hearing of the Ontario Approval Motion and ask to make submissions regarding the proposed settlement with the Dealers.

Persons intending to object to the approval of the Settlement Agreement, the Allocation and Distribution protocol or fee and expense application are required to deliver a Notice of Objection, substantially in the form

that can be found on the Class Action Websites, and, if this Notice is received by mail or email, enclosed with

this Notice (the "Notice of Objection"), to Siskinds LLP by regular mail, courier, or email transmission, to the

contact information indicated on the Notice of Objection, so that it is received by no later than 5:00 p.m. on

April 1, 2015. Copies of the Notices of Objection sent to Siskinds LLP will be filed with the Ontario Superior

Court.

Following the hearing of the Ontario Approval Motion, if the settlement is approved, there will be a hearing in the

United States Bankruptcy Court in connection with the Chapter 15 Proceeding for an order recognizing and enforcing

the order granting approval of the Dealers Settlement in the United States.

## Hearing for Recognition and Enforcement on June 9, 2015 in New York, New York

Among other things, the Settlement Agreement is conditioned on the entry of an order recognizing and enforcing the

order granting the Ontario Approval Motion with respect to the Dealers Settlement in the United States. Accordingly,

United States bankruptcy counsel for the Plaintiffs, Lowenstein Sandler LLP will file a motion (the "Dealers

Settlement Recognition Motion") with the United States Bankruptcy Court seeking such relief, subject to the result of

the Ontario Approval Motion. Copies of the Dealers Settlement Recognition Motion will be available on the Class

Action Websites.

On June 9, 2015, at 10:00 a.m. (ET), a hearing has been scheduled on the Dealers Settlement Recognition Motion

before the Honorable Martin Glenn, United States Bankruptcy Judge, in Courtroom 501 of the United States

Bankruptcy Court, One Bowling Green, New York, New York. If the Ontario Approval Motion is granted, the United

-4-

States Bankruptcy Court will consider on June 9, 2015, or a later date if necessary, whether to grant an order

recognizing and enforcing the order granting the Ontario Approval Motion with respect to the Dealers Settlement in

the United States.

Any objections or responses to the Dealers Settlement Recognition Motion, which will be considered separately

by the United States Bankruptcy Court from any objections made with respect to the Ontario Approval Motion,

must be made in accordance with the United States Bankruptcy Code, the Federal Rules of Bankruptcy

Procedure, and the Local Rules for the Bankruptcy Court. In addition, such objection or response must be

made in writing describing the basis therefore and filed with the United States Bankruptcy Court electronically

in accordance with General Order M-399 by registered users of the United States Bankruptcy Court's

electronic case filing system, and by all other parties in interest, on a 3.5 inch disc, preferably in Portable

Document Format (PDF), Word Perfect or any other Windows-based word processing format, with a hard copy

to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, Southern District of New

York, One Bowling Green, New York, NY 10004-1408 and served upon United States bankruptcy counsel for

the Dealers at Sherman & Sterling LLP, 599 Lexington Avenue, New York, NY 10022, United States Attention:

Jaculin Aaron, and United States bankruptcy counsel for the Plaintiffs, Lowenstein Sandler LLP, 1251 Avenue

of the Americas, New York, N.Y. 10020, Attention: Michael S. Etkin and Andrew D. Behlmann, so as to be

received by them no later than May 29, 2015 at 5 p.m. (ET).

THE ONTARIO SUPERIOR COURT MAY APPROVE A CLAIMS AND DISTRIBUTION PROTOCOL

THAT IS DIFFERENT THAN THE CLAIMS AND DISTRIBUTION PROTOCOL THAT IS PROPOSED BY

CLASS COUNSEL. WHETHER OR NOT THEY SUBMIT A VALID CLAIM FORM, ALL PERSONS OR

ENTITIES THAT ARE ENTITLED TO PARTICIPATE IN THE DEALERS SETTLEMENT WILL BE BOUND BY THE CLAIMS AND DISTRIBUTION PROTOCOL, WHATEVER IT MAY BE, THAT IS APPROVED BY THE ONTARIO SUPERIOR COURT.

### The Administrator

The Ontario Superior Court has appointed NPT RicePoint as the Administrator of the settlement. The Administrator

will, among other things: (i) receive and process the claim forms; (ii) make determinations of Class Members'

eligibility for compensation pursuant to the Claims and Distribution Protocol; (iii) communicate with Class Members

regarding their eligibility for compensation; and (iv) manage and distribute the net settlement amount. The

Administrator can be contacted at:

Mailing Address: NPT RicePoint Class Action Services

Sino-Forest Class Action

P.O. Box 3355

London, ON N6A 4K3

Telephone: 1-866-432-5534

Email Address: sino@nptricepoint.com

Website: www.nptricepoint.com

## **Further Information**

If you would like additional information, please contact Koskie Minsky LLP, Siskinds LLP, Siskinds Desmeules

sencrl, or Cohen Milstein Sellers & Toll PLLC using the information below:

Garth Myers, Jonathan Ptak

Koskie Minsky LLP

20 Queen St. West, Suite 900, Box 52, Toronto, ON, M5H 3R3

Re: Sino-Forest Class Action

Tel: 1.866.474.1739 (within North America)

Tel: 416.595.2158 (outside North America)

Email: sinoforestclassaction@kmlaw.ca

- 5 -

Dimitri Lascaris, Charles Wright

Siskinds LLP

680 Waterloo Street, P.O. Box 2520 London, ON N6A 3V8

Re: Sino-Forest Class Action

Tel: 1.800.461.6166 x 2380 (within North America)

Tel: 519.672.2251 x 2380 (outside North America)

Email: sinoforest@siskinds.com

Simon Hebert

Siskinds Desmeules, sencrl

43 Rue Buade, Bureau 320, Québec City, Québec, G1R 4A2

Re: Sino-Forest Class Action

Tel: 418.694.2009

Email: simon.hebert@siskindsdesmeules.com

Richard Speirs, Genevieve Fontan

Cohen Milstein Sellers & Toll, PLLC

88 Pine Street

New York, NY 10005

Tel. 212.838.7797

Email: lawinfo@cohenmilstein.com

## Interpretation

If there is a conflict between the provisions of this notice and the Settlement Agreement, the terms of the Settlement

Agreement will prevail.

Please do not direct inquiries about this notice to the Ontario Superior Court or the United States Bankruptcy Court.

All inquiries should be directed to Class Counsel.

DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO SUPERIOR COURT OF

**JUSTICE** 

## NOTICE OF OBJECTION

## ONLY USE THIS FORM IF YOU DO NOT LIKE THE

## DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP
680 Waterloo Street
PO Box 2520
London, ON N6A 3V8
Attention: Nicole Young
Email: sinoforest@siskinds.com
RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT
I,(please check all boxes that apply):
(insert name)
☐ am a current shareholder of Sino-Forest Corporation
☐ am a former shareholder of Sino–Forest Corporation
☐ am a current noteholder of Sino-Forest Corporation
☐ am a former noteholder of Sino-Forest Corporation
□ other (please explain)
I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the
"Order"), persons wishing to object to the Dealers Settlement, the claims and distribution
protocol, or the counsel fee application are required to complete and deliver this Notice of
Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m.

(Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol
or the counsel application for the following reasons (please attach extra pages if you require
more space):
-2-
ONLY SUBMIT AN OBJECTION IF YOU DO NOT LIKE THE DEALERS
SETTLEMENT, THE CLAIMS AND DISTRIBUTION PROTOCOL, OR THE
COUNSEL FEE APPLICATION AND WISH TO OBJECT
☐ I DO NOT intend to appear at the hearing of the motion to approve the Dealers
Settlement, the Claims and Distribution Protocol, or the Counsel Fee Application, and I
understand that my objection will be filed with the court prior to the hearing of the
motion at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th Floor Toronto,
Ontario.
☐ I DO intend to appear, in person or by counsel, and to make submissions at the hearing of
the motion to approve the Dealers Settlement, the Claims and Distribution Protocol, or
the Counsel Fee Application, at 10:00 a.m. on May 11, 2015, at 330 University Ave., 8th
Floor Toronto, Ontario.
MY ADDRESS FOR SERVICE IS: MY LAWYER'S ADDRESS FOR
SERVICE IS (if applicable):

Dota:	Signature
Email:	
Fax:	
Tel.:	
Address:	
Name:	
Email:	
Fax:	
Tel.:	
Address:	
ivame:	

## SINO-FOREST SECURITIES LITIGATION NOTICE OF MOTION TO AUTHORIZE ADDITIONAL ADMINISTRATION FEES and TO PERMIT LATE CLAIMS

## in the ERNST & YOUNG SETTLEMENT

**NI**-----

## Notice of Motion to Authorize Additional Administration Fees

NPT RicePoint Class Action Services Inc. ("NPT") is the court-appointed administrator of the settlement between the Ad Hoc Committee of Purchasers of Sino-Forest's Securities (the "Ad Hoc Committee") and Ernst & Young LLP (the "E&Y Settlement"). Due to an unexpectedly high volume of claims filed in the E&Y Settlement, materially beyond NPT's estimate in its proposal to administer the E&Y Settlement (the "Proposal"), and a corresponding increase in the amount of time required for NPT to administer the settlement, the Ad Hoc Committee seeks an order increasing NPT's fee from \$580,000 to \$1,439,125.00.

The original fee of \$580,000 proposed by NPT and approved by the court was based on an estimate that 18,200 claims would be filed and the E&Y Settlement would take 5,500 hours to

administer. The Proposal provided that the Ad Hoc Committee could return to court for authorization of additional fees for NPT if there was a material increase in claims filed in the E&Y Settlement. Such a material increase has occurred, and over 49,625 claims have now been filed (2.73 times greater than anticipated in the Proposal) and NPT expects to expend approximately 12,261 hours administering the settlement (6,761 more hours than contemplated in the Proposal). In the circumstances, class counsel believes that an increase in NPT's fees from \$580,000 to \$1,439,125.00 is fair and reasonable.

## Notice of Motion to Permit Filing of Late Claims

Pursuant to court order, the deadline to file claims in the E&Y Settlement was February 14, 2014. Since that date, NPT has received approximately 1,780 late claims (the "Late Claims"). The Ad Hoc Committee seeks a court order permitting NPT to allow filing of all Late Claims received up until May 11, 2015.

## How to Object to the Motion to Authorize Additional Administrator

## Fees and to Permit Compensation for Late Claims

If you would like to object to: (a) the motion to authorize additional administration fees; and/or (b) the motion to permit filing of late claims, please email sinoforest@siskinds.com or mail a letter to Siskinds LLP 680 Waterloo Street, PO Box 2520, London, ON N6A 3V8 Attention: Nicole Young and provide (i) your name; (ii) your reason for objecting; (iii) whether or not you intend to appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims (the time and date of which are on the notice of settlement approval, enclosed); (iv) your address for service; and (v) your lawyer's address for service (if applicable).

Your objection must be received by April 1, 2015.

From:

info <info@pascalrodrigue.com>

Sent: To: Friday, February 27, 2015 11:20 PM Sino-Forest

Subject:

Fwd: Sino-Forest Securities Litigation/Litige sur titres - Sino-Forest

## À l'attention de Nicole Young,

- a) J'aimerais m'opposer à la motion visant à autoriser les frais d'administration supplémentaire
- i) Nom: Pascal Rodrigue
- ii) Motif: augmenter les frais d'administration de ~250% pour ~180% d'effort supplémentaire ne me semble pas raisonnable.
- iii) Je n'ai pas l'intention d'assister à l'audience portant à autoriser des frais d'administration supplémentaire de ~250%.
- iv) Unit 1317 / 45 Duncan St, Brisbane, Queensland, Australia, 4101

Merci,

Pascal Rodrigue

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO:	SISKINDS LLP 680 Waterloo Street PO Box 2520 London, ON N6A 3V8					
	Attention: Nicole Young					
	Email: sinoforest@siskinds.com					
RE:	SINO-FOREST CORPORATION — DEALERS SETTLEMENT					
1,_	) colo Schmwl (please check all boxes that apply): (insert name)					
	am a current shareholder of Sino-Forest Corporation					
x	am a former shareholder of Sino-Forest Corporation					
	am a current noteholder of Sino-Forest Corporation					
	am a former noteholder of Sino-Forest Corporation					
	other (please explain)					

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers-Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

gr

SETTLEMENT, THE CLAIMS AND I	YOU <u>DO NOT</u> LIKE THE DEALERS DISTRIBUTION PROTOCOL, OR THE
COUNSEL FEE APPLICATION AND WISH	claimed by Siskinds
and Koskie as 1	Feel they are excessive
and include lots of	i duplicative time
I DO NOT intend to appear at the h Settlement, the Claims and Distribution understand that my objection will be fi	1 LV IV CO
the motion to approve the Dealers Settle	unsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or m. on May 11, 2015, at 330 University Ave., 8th
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name: De 12 K Schnuck	Name:
Address: 1 Hunter St East Namilton, untain	Address:
Fax: 945 528-9000	Tel.:
Email: Schmult da Simplen	Fax:
Tel.: 905 528-8411  Fax: 905 528-8411  Email: 504 mult da simpson  wigle com  Date: F14 27/15 Sign	Email:
. 4:1	V

## ONLY USE THIS FORM IF YOU **<u>DO NOT</u>** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

VEH OINER THROOMING INC

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

٠,	(insert name) (prease check an boxes that appry).
	(Insert Interio)
	am a current shareholder of Sino-Forest Corporation
Ø	am a former shareholder of Sino-Forest Corporation
	am a current noteholder of Sino-Forest Corporation
	am a former noteholder of Sino-Forest Corporation
0	other (please explain)

(place shock all bayes that apply)

I acknowledge that pursuant to the order of Mr. Justice Morawetz dated January 29, 2015 (the "Order"), persons wishing to object to the Dealers Settlement, the claims and distribution protocol, or the counsel fee application are required to complete and deliver this Notice of Objection to Siskinds LLP by mail, courier or email to be received by no later than 5:00 p.m. (Eastern Time) on April 1, 2015.

I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

ONLY	<b>SUBMIT</b>	AN	<b>OBJECTIO</b>	ON IF	YOU	<u>DO</u>	NOT	LIKE	THE	DEA.	LERS
<b>SETTL</b>	EMENT,	THE	<b>CLAIMS</b>	AND	DISTR	IBUT	ΓΙΟΝ	<b>PROTO</b>	COL,	OR	THE
COUNSEL FEE APPLICATION AND WISH TO OBJECT											

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	mut befler cleadine	•
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₫	Settlement, the Claims and Distribut understand that my objection will be	ne hearing of the motion to approve the Dealers ion Protocol, or the Counsel Fee Application, and I be filed with the court prior to the hearing of the 2015, at 330 University Ave., 8th Floor Toronto,
	the motion to approve the Dealers S	y counsel, and to make submissions at the hearing of settlement, the Claims and Distribution Protocol, or 0 a.m. on May 11, 2015, at 330 University Ave., 8th
MY A	DDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):
Name	I hyndge Enterpriss inc	Name:
Addre	ss: 3468 BUDHAVEN DR NAIVAMO BC Y.97 GEI	Address:
Tel.:	250-756-4526	
Fax:	denidable growl.com	Tel.:
Email	:	Fax:
		Email:
Date:	MAN 1 8 2015	Signature:

From: Bruce G. Tew <BM2@SHAW.CA>
Sent: Sunday, March 01, 2015 9:17 AM

To: Sino-Forest

Cc: Margaret Y Tew; Bruce/Margaret Tew Subject: Notice of Objection re: late filings

## How to Object to the Motion to Authorize Additional Administrator Fees and to Permit Compensation for Late Claims

If you would like to object to: (a) the motion to authorize additional administration fees; and/or (b) the motion to permit filing of late claims, please email <a href="mailto:siskinds.com">siskinds.com</a> or mail a letter to Siskinds LLP 680 Waterloo Street, PO Box 2520, London, ON N6A 3V8 Attention: Nicole Young and provide (i) your name; (ii) your reason for objecting; (iii) whether or not you intend to appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims (the time and date of which are on the notice of settlement approval, enclosed); (iv) your address for service; and (v) your lawyer's address for service (if applicable).

Your objection must be received by April 1, 2015.

### As requested:

- (i) Bruce G. Tew (Account 184059S)
- (ii) Deadlines are put in place for good reason. You miss the boat...you catch the next one.
- (iii) I will not appear at the hearing of the motion to authorize additional administration fees and the motion to permit compensation for late claims.
- (iv) Home address: 6480 Wedgewood Place, NANAIMO, BC, V9V 1V4 Securities in question are on deposit with TD Waterhouse, TORONTO, ON,
- (v) Not applicable.

From: Stan Turner <z1turner@yahoo.ca>

Sent: Saturday, February 28, 2015 12:31 AM

To: Sino-Forest Cc: Stan Turner

Subject: Objection to motion

Attn: Nicole Young

1) Objection to motion to authorize additional administration fees

2) Objection to motion to permit filing of late claims

Please find enclosed the rationale for these objections.

1) The motion to authorize additional administration fees does have some merit.

The primary objection comes from simple math.

\$580,000 for 5500 hours equals \$105.45 an hour.

\$1,439,125 for 12261 hours equals \$117.37 an hour.

Given that the first estimate is fulfilled at \$105.45 an hour, the remaining hourly rate for the balance of 6761 hours works out to \$127.07 an hour.

Why the big difference in rate for the additional hours? Was a 'bidding process' involved to win this business? Did the lowest bid win? Did the most reasonable bid win?

Given the fact that the initial estimate of time required is off by an excess amount of 123%, it seems too convenient for the winning bidder to then just claim a motion for additional fees.

Where is the professionalism in the estimate of time required knowing this type of business.

At the utmost the additional amount should not be more than \$105.45 an hour for the 12261 hours.

As an alternative to the utmost, and given a reasonable expectation of professionalism, the winning bidder should not be out by more than a factor of 100%.

Thus a reasonable authorization of additional fees might be to grant 11000 hours at \$105.45 with an allowance for inflation (say of 2.2%) given the additional time it might take to handle twice the volume; thus the second 5500 hours would be at \$107.77 an hour.

2) Some late claims may have merit since the time to file an original claim seemed fragmented and was provided with short notice. However, extending the claims filing deadline by 15 months seems simply out of order. Why would it take an additional

15 months to file a claim? I think some reasonable time period is in order failing which people that have pursued every objectionable avenue to no avail now want to join the band wagon of those that agreed to the class action from the beginning.

This may be allowing too many that disagreed when given the chance, and now having failed, want in only as a last resort because they didn't get their way.

While frankly, they don't deserve to get their way now, because it wasn't their way from the beginning.

S.T. Turner Whiterock, BC (formerly of Vancouver, BC)

I will not be attending the hearing.

My address for service is the email address.

I do not have counsel representing me other than the class action councel.

I am presently at 1184-184th St, Surrey (Whiterock), B.C.

ROBERT WONG 130

## sinoforest@siskinds.com

Objection to (b) the motion to permit filing of late claims

- (i) My name is Robert Wong. I am a representative plaintiff of the class action
- (ii) My reason for objecting:
- (a) The dead line for filing was specified in the Distribution Protocol
- (b) The protocol was approved by the court.
- (c) Article 4 of the protocol clearly specified that late claims shall not be eligible for any compensation whatsoever.
- (d) Accepting the motion to permit filing of late claims means asking the court to reject something that the court has already approved.
- (e) NPT did not have the authority to approve late claims, and processed them as valid.
- (f) The court should not provide authority to NPT to cover things they did without authority, and provide authority to NPT to accept more late claims, some of which they have not yet approved or processed
- (iii) I intend to appear at the hearing of the motion to permit compensation for late claims
- (iv) My address for service is 561 Huron Terrace, Kincardine, Ont N2Z 2H6

## ONLY USE THIS FORM IF YOU **DO NOT** LIKE THE DEALERS SETTLEMENT OR THE CLAIMS AND DISTRIBUTION PROTOCOL OR THE COUNSEL FEE APPLICATION AND WISH TO OBJECT

TO: SISKINDS LLP

680 Waterloo Street PO Box 2520 London, ON N6A 3V8

Attention: Nicole Young

Email: sinoforest@siskinds.com

RE: SINO-FOREST CORPORATION — DEALERS SETTLEMENT

Ι,	GENAVO	<u> </u>	(please check all boxes that apply):
	(insert n	arne)	
	am a current shareholder of Sino-Forest Corporation		
	am a former shareholder of Sino-Forest Corporation		
	am a current noteholder of Sino-Forest Corporation		
	am a former noteholder of Sino-Forest Corporation		
	other (please expl	ain)	

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I hereby give notice that I object to the Dealers Settlement, the claims and distribution protocol, or the counsel application for the following reasons (please attach extra pages if you require more space):

	YOU <u>DO NOT</u> LIKE THE DEALERS DISTRIBUTION PROTOCOL, OR THE
COUNSEL FEE APPLICATION AND WISI	H TO OBJECT
I OBJECT TO THE AUTHORIZATION	•
THEY BALLINALLY ESTIMATED 17 13	WORK DONE BY MPT BEYOUN WHAT CON SAMEROUSERS OF SINO FOREST WHO
AND THE WAGELING VICTIMS OF A	MY PRANBULENT ACTIVITY BY SING-FOREST
AND for its officers. BY SEE	
SHAPEHOLISERS WHO MAKE ALPEN	NAMER ETPENSE OF WHERE PEN 101 THE PRIMARY VICTIMS.
ADDITIONAL MOMIN FEES WILL	UNIT SERVE TO FURTHER REDUCE
	BUE WHILH AS IT IS, we LILL COMPENSATE THAT PORTION OF THEIR LOSS.
BY SEEKING INCREASED ADMIN	V FEES, NPT SEEKS TO FUNTHER
TAKE ASSAUTAGE OF THE MIS	FORTUNE UF SINOFOMEST SHAREHOLDERS
AND ALEWAS	of sive parest, its officers
I DO NOT intend to appear at the l	nearing of the motion to approve the Dealers
	Protocol, or the Counsel Fee Application, and I filed with the court prior to the hearing of the
	5, at 330 University Ave., 8th Floor Toronto,
Ontario.	
T. IDO introduction and in control of the control	annel and de make makemissions added bearing a 6
	ounsel, and to make submissions at the hearing of ement, the Claims and Distribution Protocol, or
• •	.m. on May 11, 2015, at 330 University Ave., 8th
Floor Toronto, Ontario.	
MY ADDRESS FOR SERVICE IS:	MY LAWYER'S ADDRESS FOR
2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -	SERVICE IS (if applicable):
Name: Coenaris 26,7	Name:
Address: 415 PATM CIA RVE	Address:
TAIN POWTO ON	
ME A ZNI	
Tel.: 4/6 2210789	
Fax:	Tel.:
Email: 92eit@ sympatio.ca	Fax:
J	Email:
	· · · · ·
Date: MAN 13 / 15 Sig	nature: //
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## 1985, c.C-36, AS AMENDED AND IN THE MATTER OF A PLAN OF COMPROMISE OR IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. ARRANGEMENT OF SINO-FOREST CORPORATION

Court File No.: CV-11-431153-00CP Court File No.: CV-12-9667-00-CL

## SUPERIOR COURT OF JUSTICE ONTARIO

Proceeding commenced at Toronto

Proceeding under the Class Proceedings Act, 1992

# AFFIDAVIT OF HEATHER PALMER

KOSKIE MINSKY LLP

900-20 Queen Street West

Toronto, ON M5H 3R3

Kirk M. Baert (LSUC#: 30942O)

Tel: 416.595.2117/Fax: 416.204.2889

Jonathan Ptak (LSUC#: 45773F)

Tel: 416.595.2149/Fax: 416.204.2903

SISKINDS LLP

**680 Waterloo Street** 

P.O. Box 2520

London, ON N6A 3V8

A. Dimitri Lascaris (LSUC#: 50074A) Tel: 519.660.7844/Fax: 519.660.7845

Charles M. Wright (LSUC#: 36599Q) Tel: 519.660.7753/Fax: 519.660.7754

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

155 Wellington Street, 35th Floor

Ken Rosenberg (LSUC #21102H) Toronto, ON M5V 3H1

Massimo Starnino (LSUC #41048G)

Fel: 416-646-4300/Fax: 416-646-4301

Lawyers for the Ad Hoc Committee of Purchasers of the Applicant's Securities, including the Class Action Plaintiffs

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