

ALLEN & OVERY LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 610-6300
Facsimile: (212) 610-6399
Ken Coleman
Jonathan Cho

Attorneys for Ernst & Young LLP

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

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

**NOTICE OF MOTION TO RECOGNIZE AND ENFORCE ORDER OF ONTARIO
COURT APPROVING ERNST & YOUNG SETTLEMENT**

PLEASE TAKE NOTICE that on September 23, 2013, Ernst & Young LLP (“**E&Y**”) filed a motion (the “**Motion**”) in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) seeking, pursuant to sections 105(a), 1507, and 1521 of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), the entry of an order giving full force and effect in the United States to the March 20, 2013 order (the “**Settlement Order**”) of the Ontario Superior Court of Justice (Commercial List) in the proceeding of Sino-Forest Corporation (“**SFC**”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, which Settlement Order approves the settlement of class action claims against E&Y and implements a global release in favor of E&Y under SFC’s plan of compromise and reorganization dated December 3, 2012. Further explanation of the Motion is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing on **November 18, 2013 at 11:00 a.m. (ET)** before the Honorable Martin Glenn in Courtroom 501 of the Bankruptcy Court, One Bowling Green, New York, New York 10004-1408 to consider the Motion and any responses or objections thereto (the “**Hearing**”).

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be made pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure. Such objection or response must be made in writing describing the basis therefore and filed with the Bankruptcy Court electronically in accordance with General Order M-399 by registered users of the 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, and served upon counsel for E&Y so as to be received by them no later than **November 7, 2013 at 4:00 p.m. (ET)**. Notices to counsel for E&Y should be addressed to Allen & Overy LLP, 1221 Avenue of the Americas, New York, NY 10020, Attention: Ken Coleman and Jonathan Cho.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by E&Y without further notice or hearing.

Dated: New York, New York
September 23, 2013

ALLEN & OVERY LLP

/s/ Ken Coleman

Ken Coleman

Jonathan Cho

1221 Avenue of the Americas

New York, New York 10020

Telephone (212) 610-6300

Facsimile (212) 610-6399

ken.coleman@allenoverly.com

jonathan.cho@allenoverly.com

Attorneys for Ernst & Young LLP

EXHIBIT A