

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

**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 PLAN OF COMPROMISE OR
ARRANGEMENT OF SINO-FOREST CORPORATION

Applicant

APPLICATION UNDER THE *COMPANIES CREDITORS'*
ARRANGEMENT ACT, R.S.C. 1985, c.C-36, AS AMENDED

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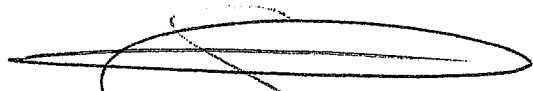
I, Christina Shiels, of the Town of Oakville, in Region of Halton, MAKE OATH AND
SAY:

1. I am a law clerk with the law firm of Lenczner Slaght Royce Smith Griffin LLP, the lawyers for Ernst & Young LLP ("E&Y") in *The Trustees of the Labourers' Pension Fund of Central and Eastern Canada et al. Sino-Forest Corporation et al.*, in Court File No. CV-11-431153-00CP. As such, I have knowledge of the matters contained in this affidavit.
2. Attached as **Exhibit "A"** is the Proof of Claim of Ernst & Young LLP against the Applicant, Sino-Forest Corporation, as filed with the Court-Appointed Monitor, FTI Consulting, on June 20, 2012.

3. Attached as **Exhibit "B"** is the Proof of Claim of Ernst & Young LLP against the Directors and Officers of the Applicant, Sino-Forest Corporation, as filed with the Court-Appointed Monitor, FTI Consulting, on June 20, 2012.

4. I make this affidavit in respect of a motion brought by Sino-Forest Corporation regarding the status of shareholder claims and related indemnity claims under the *Companies Creditors' Arrangement Act* and for no other or improper purpose.

SWORN BEFORE ME at the City of Toronto, in the Province of Ontario on June 21, 2012



Commissioner for Taking Affidavits
(or as may be)



CHRISTINA SHIELS