

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

BETWEEN:

**INTERNATIONAL FOREST PRODUCTS LLC (formerly known as
INTERNATIONAL FOREST PRODUCTS CORPORATION)**

Applicant

- and -

ST. MARYS PAPER CORP.

Respondent

**APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, R.S.C. 1985, c.B-3, AS AMENDED, AND SECTION 101 OF THE
COURTS OF JUSTICE ACT, R.S.O. 1990, C. C.43, AS AMENDED**

**NOTICE OF MOTION
(Returnable May 18, 2012)**

International Forest Products LLC (formerly known as International Forest Products Corporation ("IFP")) will make a motion to a Judge of the Commercial List at 10:00 a.m. on May 18, 2012, or as soon after that time as the motion can be heard, at 330 University Avenue, Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion will be heard orally.

THE MOTION IS FOR AN ORDER:

- (i) abridging and validating service of the Notice of Motion and the Motion Record in accordance with the affidavits of service, including the method and timing of notice, and service to the service list, so that this Motion is properly returnable today and any further service thereof upon any interested party other than the persons served with the Motion Record is dispensed with;
- (ii) granting leave to IFP to lift the stay of proceedings (the “Stay”) in these receivership proceedings as set out in the Order of the Honourable Mr. Justice Campbell dated December 29, 2011 for the purposes of filing an application for a Bankruptcy Order in respect of St. Marys Paper Corp. (“St. Marys”); and
- (iii) such further and other relief as counsel may request and this Court deems just.

THE GROUNDS FOR THE MOTION ARE:

- (a) the Receiver does not oppose the lifting of the Stay; and
- (b) it is appropriate to lift the Stay given that a bankruptcy application is being brought for the purpose of reversing certain statutory priorities; and
- (c) such further and other grounds as counsel may advise and this Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- (a) the pleadings and proceedings herein; and
- (b) such further and other material as counsel may advise and this Court permit.

Date: May 17, 2012

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TO: THE ATTACHED SERVICE LIST

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Proceeding Commenced at Toronto

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