UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 15
HOLLINGER INC., et al.,[1]	Case No. 07-11029 (PJW)
Debtors in Foreign Proceedings.	Jointly Administered
	Ref. Docket Nos. 12, 30, 46 & 54

ORDER GRANTING SUN-TIMES MEDIA GROUP, INC.'S MOTION FOR AN ORDER CLARIFYING THE SCOPE OF THE COURT'S AUGUST 10, 2007 "ORDER FOR PRELIMINARY INJUNCTION"

Upon consideration of the motion (the "Motion") of Sun-Times Media Group, Inc. ("STMG") for entry of an order clarifying this Court's Preliminary Injunction entered on August 10, 2007; and the Court being satisfied, based on the representations made in the Motion that granting the relief requested in the Motion is just and proper; and due and proper notice of the Motion having been given; and the response of the Debtors to the Motion having been considered; and after due deliberation and sufficient cause appearing therefor; it is hereby:

ORDERED that the litigation styled *Hollinger International Inc. v. Hollinger Inc.*, No. 04C-0698, pending in the Northern District of Illinois, was not stayed as to any party thereto except the Debtors by this Court's August 1, 2007 Temporary Restraining Order and this Court's August 10, 2007 Order for Preliminary Injunction, copies of which are annexed hereto as Exhibits A and B, respectively.

Dated: August 29, 2007
Wilmington, Delaware

Peter J. Walsh
United States Bankruptcy Judge

[1] These jointly administered cases are those of the following debtors: Hollinger Inc., Sugra Limited; and 4322525 Canada Inc. f/k/a 504468 N.B. Inc. (collectively, the "Debtors").

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DATE FILED 8/29/07

DOCKET NO. 64

EXHIBIT

A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 15
	)	
HOLLINGER INC., et al.,[1]	)	Case No. 07-11029 (PJW)
	)	
Debtors in Foreign Proceedings.	)	Joint Administration Proposed
	)	
	)	Re: D.I. 5

TEMPORARY RESTRAINING ORDER

Upon the motion (the "Motion") of Hollinger Inc. ("Hollinger") as foreign representative of Hollinger and its affiliated captioned debtors and participants (collectively, with Hollinger, the "Debtors") in a proceeding (the "Canadian Proceeding") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), pending before the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court"), pursuant to sections 105(a) and 1519 of title 11 of the United States Code (the "Bankruptcy Code"), for the entry of a temporary restraining order (the "TRO") and, after notice and a hearing, a preliminary injunction granting the Debtors provisional relief under sections 105(a) and 1519(a)(1) and (2) of the Bankruptcy Code and scheduling a hearing (the "Hearing") on Hollinger's request for a preliminary injunction; and the Court having considered and reviewed the Motion, the petitions filed by the Debtors under chapter 15 of the Bankruptcy Code, and required documents thereto (the "Chapter 15 Petitions"), and the Memorandum (as defined in the Motion) and the Voorheis Declaration (as defined in the Motion), each in support of the Motion and the Chapter 15

1 These jointly administered cases are those of the following debtors: Hollinger Inc.; Sugra Limited; and 4322525 Canada Inc., f/k/a 504468 N.B. Inc.

Petitions (collectively, the "Supporting Documents"), and based on the foregoing, the Court finds and concludes as follows:

a) Hollinger has demonstrated a substantial likelihood of success that the Debtors are subject to a pending foreign main proceeding in Canada and that Hollinger is the foreign representative of the Debtors;

b) The commencement or continuation of any action or proceeding in the United States against the Debtors or any of their assets or proceeds thereof should be enjoined pursuant to sections 105(a) and 1519 of the Bankruptcy Code to permit the expeditious and economical administration of the foreign estates in the Canadian Proceeding, and the relief requested will not cause either an undue hardship nor create any hardship to any party in interest that is outweighed by the benefits of the TRO;

c) Unless a restraining order is issued, it appears to the Court that there is a material risk that the Debtors' assets located in the United States could be subject to attack by creditors thereby potentially interfering with the jurisdictional mandate of this Court under chapter 15 of the Bankruptcy Code, and interfering and causing harm to, the Debtors' efforts to administer the Debtors' estates in the Canadian Proceeding, and undermining the Debtors' efforts to achieve an equitable distribution for the benefit of all of the Debtors' creditors, and as a result, the Debtors will suffer immediate and irreparable injury for which they will have no adequate remedy at law and therefore it is necessary that the Court grant the relief requested without prior notice to the parties in interest or their counsel;

d) The interest of the public will be served by this Court's granting of the relief requested by Hollinger;

e) This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334;

f) This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and

g) Venue is proper in this District pursuant to 28 U.S.C. § 1410.

NOW THEREFORE, IT IS HEREBY ORDERED THAT:

1. All persons and entities are hereby enjoined from (a) continuing any action or commencing any additional action, involving the Debtors, or their assets or the proceeds thereof; (b) enforcing any judicial, quasi-judicial, administrative or regulatory judgment, assessment or order or arbitration award against the Debtors or their assets; (c) commencing or continuing any action to create, perfect or enforce any lien, setoff or other claim against the Debtors or against any of their property; or (d) managing or exercising control over the Debtors' assets located within the United States except as expressly authorized by Hollinger in writing;

2. Until further order of this Court, Hollinger is hereby established as the exclusive representative of the Debtors in the United States with the exclusive authority to administer the Debtors' assets and affairs in the United States including, without limitation, any transfer of or withdrawals from any bank accounts maintained by the Debtors;

3. Pursuant to rule 7065(b) of the Federal Rules of Bankruptcy Procedure, no notice to any person is required prior to entry and issuance of this Order;

4. Any party in interest may make a motion seeking relief from or modifying this Order by, on not less than ten (10) days' written notice to Hollinger and to Hollinger's counsel, Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 (Attention: Derek C. Abbott) and Weil, Gotshal & Manges LLP, 757

Fifth Avenue, New York, New York, 10153 (Attention: Marcia L. Goldstein), filing a motion seeking an order of this Court vacating or modifying the injunction entered in this proceeding, and any such request shall be the subject matter of a hearing as scheduled by the Court and otherwise, any party in interest may file objections and be heard by the Court in accordance with the terms of any order of the Court providing for a hearing in the future on any subsequent relief sought by Hollinger in this proceeding;

5. Pursuant to Rule 7065 of the Federal Rules of Bankruptcy Procedure, the security provisions of Rule 65(c) of the Federal Rules of Civil Procedure are waived;

6. Copies of the Supporting Documents shall be (i) served upon the Debtors, all administrators in foreign proceedings of the Debtors, all other parties (or their counsel) known by the Debtors against whom provisional relief is sought under section 1519 of the Bankruptcy Code, including any such parties (or counsel) that have addresses outside the United States, and all parties to any litigation in which any of the Debtors is a party and that is pending in the United States as of the Petition Date, in accordance with Bankruptcy Rule 2002(q), and any interested party that becomes known to Hollinger by first class mail or overnight courier within five (5) business days of the Petition Date[2] (or three (3) business days following the time a party is identified by Hollinger, whichever is later) and (ii) by publication in The Wall Street Journal (U.S. Edition) within five (5) business days of the Petition Date or as soon thereafter as practicable;

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2 All terms not defined herein shall have the meaning ascribed to them in the Motion.

7. Service in accordance with this Order shall constitute adequate and sufficient service and notice;

8. The Supporting Documents shall also be made available by Hollinger upon request via electronic mail or at the offices of Morris Nichols Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 to the attention of Derek C. Abbott, (302) 351-9357, dabbott@mnat.com;

9. The Court shall hold a hearing on Hollinger's request for a preliminary injunction granting substantially the same relief through entry of an order on recognition of the Canadian Proceeding before the Honorable Peter J. Walsh, United States Bankruptcy Judge, for the Hearing at 10:00 .m Eastern time on Aug 10, 2007, at the United States Bankruptcy Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801 or as soon thereafter as counsel may be heard;

10. Objections, if any, submitted for the purpose of opposing Hollinger's request for a preliminary injunction on the terms described above must be made in writing describing the basis therefor and the nature and extent of the respondent's intrests in the Debtors' estates and shall be filed with the Court and served upon Morris Nichols Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 (Attention: Derek C. Abbott) and Weil, Gotshal & Manges LLP, 757 Fifth Avenue, New York, New York, 10153 (Attention: Marcia L. Goldstein), counsel for Hollinger, so as to be received on or before Aug 7, 2007 at 4:00 .m. Eastern time; except that the foregoing is without prejudice to the right of any party-in-interest to seek, upon appropriate notice and hearing, to terminate or limit this temporary restraining order;

11. If no objection to the Debtors' request for a preliminary objection is timely filed and served in accordance with this Order, this Court will enter the proposed Order for Preliminary Injunction without further notice or hearing.

12. This Order will remain in effect until the earlier of the entry of an order granting or denying the preliminary injunction, or the entry of an order recognizing the Canadian Proceeding as a foreign main proceeding in accordance with 11 U.S.C. § 1517; and

13. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: August 1, 2007
Wilmington, Delaware

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT

B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 15
	)	
HOLLINGER INC., et al.,[1]	)	Case No. 07-11029 (PJW)
	)	
Debtors in Foreign Proceedings.	)	Jointly Administered
	)	
	)	Re: D.I. 5, 12

ORDER FOR PRELIMINARY INJUNCTION

Upon the motion (the "Motion") of Hollinger Inc. ("Hollinger") as foreign representative of Hollinger and its affiliated captioned debtors and participants (collectively, with Hollinger, the "Debtors") in a proceeding (the "Canadian Proceeding") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), pending before the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court"), pursuant to sections 105(a) and 1519 of title 11 of the United States Code (the "Bankruptcy Code"), for the entry of, after notice and a hearing, a preliminary injunction granting the Debtors provisional relief under sections 105(a) and 1519(a)(1) and (2) of the Bankruptcy Code; and the Court having considered and reviewed the Motion, the petitions filed by the Debtors under chapter 15 of the Bankruptcy Code, and required documents thereto (the "Chapter 15 Petitions"), and the Memorandum (as defined in the Motion) and the Voorheis Declaration (as defined in the Motion), each in support of the Motion and the Chapter 15 Petitions (collectively, the "Supporting Documents"), and based on the foregoing, the Court finds and concludes as follows:

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1 These jointly administered cases are those of the following debtors: Hollinger Inc.; Sugra Limited; and 4322525 Canada Inc., f/k/a 504468 N.B. Inc.

a) Hollinger has demonstrated a substantial likelihood of success that the Debtors are subject to a pending foreign main proceeding in Canada and that Hollinger is the foreign representative of the Debtors;

b) The commencement or continuation of any action or proceeding in the United States against the Debtors or any of their assets or proceeds thereof should be enjoined pursuant to sections 105(a) and 1519 of the Bankruptcy Code to permit the expeditious and economical administration of the foreign estates in the Canadian Proceeding, and the relief requested will not cause either an undue hardship or that any hardship to the parties in interest is outweighed by the benefits;

c) Unless a preliminary injunction is issued, it appears to the Court that there is a material risk that the Debtors' assets located in the United States could be subject to attack by creditors thereby potentially interfering with the jurisdictional mandate of this Court under chapter 15 of the Bankruptcy Code, and interfering and causing harm to, the Debtors' efforts to administer the Debtors' estates in the Canadian Proceeding, and undermining the Debtors' efforts to achieve an equitable distribution for the benefit of all of the Debtors' creditors, and as a result, the Debtors will suffer immediate and irreparable injury for which they will have no adequate remedy at law and therefore it is necessary that the Court grant the relief requested;

d) The interest of the public will be served by this Court's granting of the relief requested by Hollinger;

e) This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334;

f) This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and

g) Venue is proper in this District pursuant to 28 U.S.C. § 1410.

NOW THEREFORE, IT IS HEREBY ORDERED THAT:

1. All persons and entities are hereby enjoined from (a) continuing any action or commencing any additional action involving the Debtors or their assets or the proceeds thereof; (b) enforcing any judicial, quasi-judicial, administrative or regulatory judgment, assessment or order or arbitration award against the Debtors or their assets; (c) commencing or continuing any action to create, perfect or enforce any lien, setoff or other claim against the Debtors or against any of their property; or (d) managing or exercising control over the Debtors' assets located within the United States except as expressly authorized by Hollinger in writing.

2. If a plaintiff in an action in which any one of the Debtors is or was named as a party, or as a result of which liability against any one of the Debtors may be established, all persons and entities are required to place the Debtors' United States counsel on the master service list of any such action or proceeding and take such other steps as may be necessary to ensure that such counsel receives at the address set forth below in the last paragraph of this Order (i) copies of any and all documents served by the parties to such action or proceeding or issued by the court, arbitrator, administrator, regulator or similar official having jurisdiction over such action or proceeding and (ii) any and all correspondence or other documents circulated to parties listed on the master service list.

3. With respect to any action in which any one of the Debtors may have an interest that may become known to the Debtors in the future (each a "Subsequent Claim") (i) when informed of a Subsequent Claim, United States counsel for the Debtors shall serve upon the holder of such claim a copy of the Supporting Documents and this Order or any extension thereof; (ii) the holder of a Subsequent Claim will have twenty (20) days from service of the Supporting Documents in which to file a response thereto or otherwise be enjoined from

commencing or continuing the action involving any one of the Debtors, or its assets or proceeds thereof; and (iii) on not less than ten (10) days' notice to Debtors' counsel, Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 (Attention: Derek C. Abbott) and Weil, Gotshal & Manges LLP, 757 Fifth Avenue, New York, New York, 10153 (Attention: Marcia L. Goldstein), the holder of a Subsequent Claim may file a motion seeking an order of the Court vacating or modifying the injunction entered in this proceeding with respect to such Subsequent Claim, and any such request shall be the subject matter of a hearing as scheduled by the Court and otherwise, the holder of a Subsequent Claim may file objections and be heard by the Court in accordance with the terms of any order of the Court providing for a hearing in the future on any subsequent relief sought by the Petitioners in this case.

4. Any party in interest may make a motion seeking relief from or modifying this Order by, on not less than ten (10) days' written notice to Hollinger and to Hollinger's counsel, Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 (Attention: Derek C. Abbott) and Weil, Gotshal & Manges LLP, 757 Fifth Avenue, New York, New York, 10153 (Attention: Marcia L. Goldstein), filing a motion seeking an order of this Court vacating or modifying the injunction entered in this proceeding, and any such request shall be the subject matter of a hearing as scheduled by the Court and otherwise, any party in interest may file objections and be heard by the Court in accordance with the terms of any order of the Court providing for a hearing in the future on any subsequent relief sought by the Debtors in this proceeding.

5. Until further order of this Court, Hollinger is hereby established as the exclusive representative of the Debtors in the United States with the exclusive authority to

administer the Debtors' assets and affairs in the United States including, without limitation, any transfer of or withdrawals from any bank accounts maintained by the Debtors.

6. Pursuant to rule 7065 of the Federal Rules of Bankruptcy Procedure, the security provisions of Rule 65(c) of the Federal Rules of Civil Procedure are waived.

7. This Order will remain in effect until the entry of an order recognizing the Canadian Proceeding as a foreign main proceeding in accordance with 11 U.S.C. § 1517.

8. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: August 10 2007
Wilmington, Delaware

THE HONORABLE PETER J. WALSH
UNITED STATES BANKRUPTCY JUDGE

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