

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States Securities & Exchange  
Commission,

Plaintiff,

-against-

China North East Petroleum Holdings  
Limited; Wang Hongjun (a/k/a Hongjun  
Wang); Ju Guizhi (a/k/a Guizhi Ju); and Jian  
Chao (a/k/a Chao Jiang),

Defendants,

Jiang Mingfu (a/k/a Mingfu Jiang); and Sun  
Jishuang (a/k/a Jishuang Sun),

Relief Defendants.

CASE NO. 12-CV-8696 (NRB)

ECF Case

**Oral argument requested**

**DEFENDANT WANG HONGJUN AND RELIEF DEFENDANT SUN JISHUANG'S  
NOTICE OF THEIR JOINT MOTION TO DISMISS THE COMPLAINT WITH  
PREJUDICE**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Defendant Wang Hongjun and Relief Defendant Sun Jishuang's Joint Motion to Dismiss the Complaint with Prejudice and the declaration of Geoffrey H. Coll, both dated April 12, 2013, Wang Hongjun and Sun Jishuang will move this Court before the Honorable Naomi Reice Buchwald, at a time to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing all of Plaintiff's claims against Defendant Wang Hongjun and Relief Defendant Sun Jishuang in the above-captioned action.

April 12, 2013

Respectfully submitted,

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