

This is the 2nd affidavit of Roland Willson in this case and was made on January 10, 2025

No. S-224444 Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C., 1985 c. C-36, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF CANADIAN DEHUA INTERNATIONAL MINES GROUP INC., WAPITI COKING COAL MINES CORP. AND CANADIAN BULLMOOSE MINES CO., LTD.

PETITIONERS

AFFIDAVIT #2 of ROLAND WILLSON

- I, Roland Willson, West Moberly First Nations' Chief, of Hudson's Hope, British Columbia, SOLEMNLY AFFIRM THAT:
- 1. I am the Chief of West Moberly First Nations. As such, I have personal knowledge of the facts set out below, except where stated to be on information and belief, in which case I verily believe them to be true.
- 2. In my first affidavit I stated that the source of funds for the offers on the Wapiti and Bullmoose assets was a wholly Canadian source, further to an agreement which requires the West Moberly First Nations to maintain confidentiality.
- 3. In the application response of Qu Bo Liu, filed January 9, 2025, at para. 16, she speculates that it is possible that the source of the funds for the West Moberly First Nations' bids is either

Canada Zhonghe Investment Ltd. or China Shougang International Trade & Engineering Corporation.

- 4. To be clear, by "wholly Canadian source" I did not mean a Canadian domiciled affiliate of a Chinese company.
- 5. More specifically, I have reviewed the list of proofs of claim received in this proceeding from the Monitor's Seventh Report, and the source of funds for the West Moberly First Nations bids is not connected to any of those entities.
- 6. I was not physically present before the lawyer commissioning this affidavit, but was in the lawyer's electronic presence linked with the lawyer using video technology and the process described in the Law Society of British Columbia Code of Professional Conduct for remote commissioning of affidavits was used.
- 7. I acknowledge the solemnity of making this affidavit and acknowledge that I am aware of the consequences of making an untrue statement in this affidavit.

Roland Willson

AFFIRMED BEFORE ME at Vancouver, British Columbia, on 10 January 2025.

A Commissioner for taking

affidavits for British Columbia

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