



District of British Columbia
Division No. 03-Vancouver
Vancouver Registry
Court No. B-220142
Estate No. 11-254383

**IN THE SUPREME COURT OF BRITISH COLUMBIA
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE BANKRUPTCY OF
CANADIAN DEHUA INTERNATIONAL MINES GROUP INC.**

APPLICATION FOR BANKRUPTCY ORDER

China Shougang International Trade & Engineering Corporation, a limited liability company incorporated in Beijing, People's Republic of China, having an address for service in this proceeding care of its solicitors, Dentons Canada LLP, 20th Floor, 250 Howe Street, Vancouver, British Columbia, V6C 3R8 (the "**Applicant**"), hereby applies to the Court for an order that Canadian Dehua International Mines Group Inc., a company incorporated in British Columbia, Canada, having an address for service at the registered and records office at Suite 202 – 2232 West 41st Avenue, Vancouver, British Columbia, V6M 1Z8 (the "**Debtor**"), be adjudged bankrupt and that a bankruptcy order be made in respect of the property of the Debtor (the "**Application**"), and says that:

1. The Debtor is within the jurisdiction of this Court as it has, during the year immediately preceding the filing of the Application, resided in Vancouver, British Columbia.
2. As at March 2, 2022, the Debtor was, and remains, justly and truly indebted to the Applicant in the amount of (i) \$20,821,091.49, being the outstanding amount of the judgment granted January 19, 2021, by the Supreme Court of British Columbia (the "**Judgment**"); plus (ii) post-judgment interest from January 19, 2021; plus (iii) the Applicant's legal costs associated with the Judgment (collectively, (i), (ii) and (iii) are referred to herein as the "**Indebtedness**").
3. The Applicant does not, nor does any person on behalf of the Applicant, hold any security on the property of the Debtor, or on any part thereof, for the payment of the Indebtedness.

4. The Debtor has committed acts of bankruptcy under s. 42(1) of the *Bankruptcy and Insolvency Act*, R.S.C., 1985, c. B-3 (the "**BIA**"), within the six months preceding the date of filing of the Application, as follows:
- (a) under s. 42(1)(e) of the *BIA*:
 - (i) the Debtor permit execution against the Debtor by way of writ of seizure and sale dated September 21, 2021, under which the Debtor's shares in Canadian Kailuan Dehua Mines Co., Ltd. were seized in execution on or about October 25, 2021, which have remained unsatisfied since the date of seizure; and
 - (b) under s. 42(1)(j) of the *BIA*, the Debtor ceased to meet its liabilities generally as they became due, including, without limitation, by failing to pay:
 - (i) the Indebtedness, which, by virtue of the Judgment, is a continuing demand; and
 - (ii) a judgment in favour of Canada Zhonghe Investments Ltd. in the amount of \$5,277,256.51 pursuant to a default judgment granted August 30, 2021, by the Supreme Court of British Columbia.
5. D. Manning & Associates Inc., of Suite 520-625 Howe Street, Vancouver, British Columbia, is a person qualified to act as trustee of the property of the Debtor, and has agreed to act as such and is acceptable to the Applicant.

Dated at Vancouver, British Columbia this 2nd day of March, 2022.

CHINA SHOUGANG INTERNATIONAL TRADE & ENGINEER CORPORATION, by its solicitors and agent


Jordan Schultz
Dentons Canada LLP

Issued at the City of Vancouver in the Province of British Columbia, this 6th day of ~~March~~ April 2022.

original signed by
K. DAY
Deputy District Registrar

Registrar in Bankruptcy