



This is the 2nd affidavit of Wen-Shih Yang in this case and was made on August 28, 2024

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.

PETITIONER

**AFFIDAVIT**

I, Wen-Shih Yang, Legal Administrative Assistant of 2800 Park Place, 666 Burrard Street, Vancouver, British Columbia, AFFIRM THAT:

1. I am a legal administrative assistant employed by DLA Piper (Canada) LLP, counsel for the petitioner, Canadian Dehua International Mines Group Inc., in this action, and therefore have personal knowledge of the matters herein after deposed to, except where stated to be based on information and believe, and where so stated I do verily believe the same to be true.
2. Attached hereto and marked as **Exhibit "A"** is a true copy of an email from Barry Fraser dated August 28, 2024.

AFFIRM BEFORE ME at Vancouver, British Columbia, on August 28, 2024. )

\_\_\_\_\_)  
 A Commissioner for taking Affidavits for British Columbia. )

**Jianna Faner**  
*Barrister & Solicitor*  
**DLA Piper (Canada) LLP**  
 1133 Melville Street, Suite 2700  
 Vancouver, BC V6E 4E5  
 604.687.9444

\_\_\_\_\_)  
**WEN-SHIH YANG**  
 )

This is **Exhibit "A"** referred to in the Affidavit of Wen-Shih Yang affirmed before me at Vancouver, British Columbia on this the 28th day of August, 2024.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

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A Commissioner for taking Affidavits for  
British Columbia

**Yang, Dannis**

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**From:** R. Barry Fraser <BFraser@FraserLitigation.com>  
**Sent:** Wednesday, August 28, 2024 2:20 PM  
**To:** Bradshaw, Jeffrey; Xiao (Helen) Liu; Hunter, Carole  
**Cc:** Brousson, Colin; He, Weiguo (William); Yang, Dannis; Bradshaw, Jeffrey; craig.munro@fticonsulting.com  
**Subject:** [EXTERNAL] Offer to Purchase - Canadian Dehua International Mines Group Inc.

**DLA Piper (Canada) LLP ALERT:** This is an external email. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Jeffrey:

We act for Mrs. Qubo Liu, who has provided Debtor in Possession financing for Canadian Dehua International Mines Group Inc. ("CDI") in the amount of \$1,459,331.16 (the "DIP Loan") according to the records we have reviewed.

We have instructions to prepare and present on behalf of Mrs. Liu, on an expedited basis, an offer to purchase the shares of Wapiti Coking Coal Mines Corporation and Canadian Bullmoose Mines Co. Ltd., (the "Companies") together with any and all rights, property and assets belonging to and relating to the Companies, including all mineral and coal licences, geological and exploration data and intellectual property (the "Assets"), for the total sum of \$600,000.00 to be paid by way of a set-off in the amount of \$500,000 against Mrs. Liu's DIP Loan and the balance of \$100,000 in cash which can be used by CDI and the Monitor to pursue the monetization of the remaining properties of CDI for the benefit of its creditors.

The offer will be subject only to the shares of the Companies and the Assets being free and clear of all encumbrances at the closing date which we anticipate will take place within 5 business days of court approval and entry of a satisfactory vesting order. The offer will not require negotiation will be capable of being accepted without further negotiation, although Mrs. Liu is open to a discussion about its terms.

Upon acceptance of the offer by CDI, Mrs. Liu will provide a good faith deposit of \$50,000 to your firm to be held in trust pending court approval and completion of the transaction. We understand that you will be including this communication in the Monitor's Report for the hearing before Justice Walker on Friday. If there is anything further you require from us at this time, please let us know.

Regards,

Barry Fraser

**R. Barry Fraser / Fraser Litigation Group**  
Managing Partner

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FRASER / BATKIN / TRIBE LLP

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**From:** Bradshaw, Jeffrey <jeffrey.bradshaw@dlapiper.com>  
**Sent:** Tuesday, August 27, 2024 8:38 PM  
**To:** Xiao (Helen) Liu <hliu@fraserlitigation.com>; Hunter, Carole <carole.hunter@dlapiper.com>  
**Cc:** Brousson, Colin <colin.brousson@dlapiper.com>; He, Weiguo (William) <william.he@dlapiper.com>; R. Barry Fraser <BFraser@FraserLitigation.com>; Yang, Dannis <dannis.yang@dlapiper.com>  
**Subject:** Re: [EXTERNAL] Dehua International Mines Group Inc.

Hi Helen and Barry,

Further to our call today we were of the understanding that we would receive some correspondence relating to this transaction today. We have not received any update. We were contacted by Court scheduling late in the day that we will be appearing before Justice Walker on Friday at 10am by Teams. The Company and the Monitor will have to file materials tomorrow.

We cannot stress the urgency of this situation enough. We have been contacted by counsel for a competing bidder who will be in attendance and have been advised that they will be opposing any extension of time for your client's offer. The Company has to decide a path forward for those materials and we are out of time.

Please contact me at your earliest opportunity tomorrow morning to discuss. I can be reached on my cell at 604-649-1428.

Regards,  
Jeffrey

No. S-224444  
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**AFFIDAVIT**

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File No.: 080762-00014

JDB/day