



FORCE FILED

No. S-224444
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITOR' ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36

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

NOTICE OF APPLICATION

Name of applicant: FTI Consulting Canada Inc. (the “**Monitor**”)

To: The Service List as set out in **Schedule “A”**

TAKE NOTICE that an application will be made by the applicant to the presiding Judge at the courthouse at 800 Smithe Street, Vancouver, British Columbia on January 27, 2025, at 10:00 AM, for the orders set out in Part 1 below.

The applicant estimates that the application will take one hour.

This matter is not within the jurisdiction of an associate judge. Justice Walker is seized of these CCAA proceedings.

Part 1: ORDER(S) SOUGHT

1. An order substantially in the form hereto as **Schedule “B”** (the “**Approval Order**”), which, among other things:

- (a) approving the conduct and activities of the Monitor as described in the following reports:
 - (i) First Report of the Monitor dated and filed June 8, 2022;
 - (ii) Second Report of the Monitor dated and filed June 24, 2022;

- (iii) Third Report of the Monitor dated and filed August 17, 2022;
- (iv) Fourth Report of the Monitor dated November 28, 2022 and filed November 29, 2022;
- (v) Fifth Report of the Monitor dated and filed March 7, 2023;
- (vi) Sixth Report of the Monitor dated and filed June 7, 2023;
- (vii) Seventh Report of the Monitor dated and filed September 7, 2023;
- (viii) Eighth Report of the Monitor dated and filed November 10, 2023;
- (ix) Ninth Report of the Monitor dated and filed January 16, 2024;
- (x) Tenth Report of the Monitor dated February 20, 2024 and filed February 21, 2024;
- (xi) Eleventh Report of the Monitor dated and filed March 14, 2024;
- (xii) Twelfth Report of the Monitor dated and filed May 6, 2024;
- (xiii) Thirteenth Report of the Monitor dated and filed June 7, 2024;
- (xiv) Fourteenth Report of the Monitor dated July 8, 2024 and filed July 9, 2024;
- (xv) Fifteenth Report of the Monitor dated and filed August 7, 2024;
- (xvi) Sixteenth Report of the Monitor dated and filed August 29, 2024;
- (xvii) Seventeenth Report of the Monitor dated and filed September 16, 2024;
- (xviii) Eighteenth Report of the Monitor dated and filed October 8, 2024;
- (xix) Nineteenth Report of the Monitor dated October 16, 2024 and filed October 17, 2024;

- (xx) Twentieth Report of the Monitor dated November 18, 2024 and filed November 19, 2024;
- (xxi) Supplement to the Twentieth Report of the Monitor dated December 1, 2024 and filed December 2, 2024;
- (xxii) Twenty-First Report of the Monitor dated December 12, 2024 and filed December 13, 2024 (the “**Twenty-First Report**”);
- (xxiii) Twenty-Second Report of the Monitor dated January 12, 2025 and filed January 13, 2025 (the “**Twenty-Second Report**”); and
- (xxiv) Twenty-Third Report of the Monitor dated January 20, 2025 and filed January 20, 2025 (the “**Twenty-Third Report**”).

(collectively, the “**Monitor’s Reports**”).

- (b) approving the fees and disbursements of the Monitor from the commencement of the Monitor’s mandate to December 31, 2024 as summarized in the Twenty-Second Report and as set out in Affidavit #1 of Craig Munro;
 - (c) approving the fees and disbursements of Bennett Jones LLP (“**Bennett Jones**”) in its capacity as counsel to the Monitor, as summarized in the Twenty-Second Report and set out in Affidavit #1 of Mia Laity;
 - (d) increasing the amount of the Administration Charge as provided for in paragraph 31 of the Seventh Amended and Restated Initial Order dated October 9, 2024 from \$350,000 to \$700,000.
2. Such other relief as this Court may deem just.

Part 2: FACTUAL BASIS

Overview

1. On June 3, 2022, the Canadian Dehua International Mines Group Inc., (the “**Petitioner**”) were granted protection under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36

(the “**CCAA**”) pursuant to an order granted by the Supreme Court of British Columbia (the “**Initial Order**”). FTI Consulting Canada Inc. was appointed as Monitor of the Petitioners (the “**Monitor**”).

2. Wapiti Coking Coal Mines Corp. and Canadian Bullmoose Mines Co., Ltd. were subsequently added as additional parties to the CCAA proceedings (the “**Additional Parties**”) by an order of the Court dated October 9, 2024 (collectively the Additional Parties and the Petitioner, the “**Petitioners**”).

3. The Petitioners are companies that invest in and operate mining assets in British Columbia and elsewhere.

4. Given their liquidity challenges and dire need for stability, the Petitioners, in consultation with its advisors, determined that it was in the best interests of the Petitioners and its stakeholders to initiate these proceedings and seek the Initial Order.

5. The Twenty-Third Report outlines the specific activities taken by the Monitor from the time of its appointment to the present, and the Monitor seeks approval for its conduct and activities as set out in the Twenty-Third Report.

6. The Twenty-Third Report outlines the status of professional fees secured by the Administration Charge, and provides information on the fees and expenses charged by the Monitor and Monitor’s legal counsel.

Part 3: LEGAL BASIS

Approval of the Monitor’s activities

5. Requests to approve monitors’ reports are “not unusual” and are “routinely granted”.

Target Canada Co. (Re), 2015 ONSC 7574 at para 2.

6. There are policy and practical reasons for the Court to approve the Monitor’s activities and provide a level of protection for the Monitor during the CCAA proceedings. Specifically, the approval:

- (a) allows the monitor and stakeholders to move forward confidently with the next step in the proceeding by fostering the orderly building-block nature of CCAA proceedings;
- (b) brings the monitor's activities in issue before the court, allowing an opportunity for the concerns of the court or stakeholders to be addressed, and any problems to be rectified in a timely way;
- (c) provides certainty and finality to processes in the CCAA proceedings and activities undertaken (eg., asset sales), all parties having been given an opportunity to raise specific objections and concerns;
- (d) enables the court, tasked with supervising the CCAA process, to satisfy itself that the monitor's court-mandated activities have been conducted in a prudent and diligent manner;
- (e) provides protection for the monitor, not otherwise provided by the CCAA; and
- (f) protects creditors from the delay in distribution that would be caused by:
 - (i) re-litigation of steps taken to date; and
 - (ii) potential indemnity claims by the monitor.

Target Canada Co. (Re), 2015 ONSC 7574 at para 12.

Fees and disbursements of the Monitor and its counsel

7. The interim financing order dated June 10, 2022 provides an administration charge of \$350,000 to secure payment of the fees and disbursements of the Petitioners' legal counsel, the Monitor and the Monitor's legal counsel.

8. The Monitor and its counsel have been paid their fees and disbursements at their standard rates and charged by the Petitioners from time to time, in accordance with the terms of the ARIO. The Monitor's invoices for the period from **June 3, 2022** to **December 31, 2024** are set out in **Exhibit "A"** of Affidavit #1 of **Craig Munro**.

9. It is not the Court's role to determine the Monitor's fees and disbursements by conducting a line by line review of the supporting documents. Nor is the Court to second guess the amount of time spent by a monitor unless it is clearly excessive or overreaching. The appellate courts have directed that judges should consider all the relevant factors and should award costs (or fees) in a more holistic manner.

Bank of Nova Scotia v Diemer, 2014 ONSC 365 at para 19; aff'd 2014 ONCA 851.

10. The Petitioners seek approval of the fees and disbursements incurred by the Monitor and its counsel, Bennett Jones LLP, for the following reasons:

- (a) The fees are fair and reasonable. The Monitor's estimated, and incurred, fees and disbursements are fair and reasonable in the circumstances considering the "overriding principle of reasonableness" and the overall value contributed by the Monitor and its counsel. The Court has recognized certain non-exhaustive factors which apply in this case, including: (i) the complexity of the issues and the competing interests of multiple stakeholders; and (ii) the material, positive impact of the Monitor and its counsel's efforts in advancing the CCAA proceedings.
- (b) The time incurred. The time spent is commensurate with the significant role, responsibilities and activities undertaken by the Monitor and its counsel.
- (c) The knowledge, experience and skill. The Monitor and its counsel have significant knowledge, experience and skill in complex restructuring matters.
- (d) The diligence and thoroughness. The breadth of matters detailed in the Seventh Report and the Monitor's other reports to Court demonstrate the diligence and thoroughness displayed by the Monitor and its counsel throughout the CCAA proceedings.
- (e) The responsibilities assumed. The Monitor, with the assistance of its counsel, assumed significant responsibilities and carried out extensive activities, which are detailed in the Seventh Report.

- (f) The results achieved. The efforts of the Monitor and its counsel, including the contribution to the completion of several critical steps in these proceedings, were integral to advancing the CCAA proceedings.
- (g) The cost of comparable services. The monitor and its counsel billed amounts at each firm's standard/regular hourly rates, which are consistent with the hourly rates charged by other firms of comparable size and expertise for the provision of similar services.

Nortel Networks Inc., 2022 ONSC 6680 at para 10;

Re Nortel Networks Corporation et al, 2017 ONSC 673 at paras 15 and 21;

Vantreight v Vantreight, 2007 BCSC 1345 at para 43;

Street v Sather Ranch Ltd, 2021 BCSC 1090 at para 50.

11. Accordingly, the fees and disbursements of the Monitor and its counsel, are fair and reasonable in the circumstances and ought to be approved.

Increase to Administration Charge

12. The non-exhaustive factors that courts may consider in approving or increasing an administrative charge and setting the amount are:

- (a) the size and complexity of the businesses being restructured;
- (b) the proposed role of the beneficiaries of the charge;
- (c) whether there is an unwarranted duplication of roles;
- (d) whether the quantum of the proposed charge appears to be fair and reasonable;
- (e) the position of the creditors likely to be affected by the charge; and
- (f) the position of the monitor.

Canwest Publishing Inc. (Re), 2010 ONSC 2222 at para. 54

13. Administration charges are sometimes increased in the midst of CCAA proceedings, as may be appropriate. Each such case depends on the specific facts and circumstances, both historically and what might be expected in the future.

Alderbridge Way GP Ltd. (Re), 2022 BCSC 1694 at para. 52

14. In this case:

- (a) although the size of the business is not large, it has proven to be more complex to restructure than anticipated at the outset of the proceeding as indicated by the length of the proceeding and the number of expressions of interest that have failed to result in a consummated transaction;
- (b) the anticipated roles of the professionals have increased, and in particular certain enhanced powers of the Monitor were ordered to increase oversight over the sales process;
- (c) there has not been a duplication of roles;
- (d) the quantum of the Administration Charge (which was established in the Initial Order made June 3, 2022) no longer appears to be fair and reasonable given that even if the amount available under the DIP Loan were fully advanced, insufficient funds are available to satisfy the outstanding professional fees never mind fund further professional fees going forward to close a transaction and deal with remaining assets;
- (e) creditors are unlikely to be prejudiced by the increase in the charge given that the professionals would not be prepared to continue to incur professional fees to close a transaction unless they are secured, and absent a transaction there would be no recovery for any creditor in this proceeding; and
- (f) the Monitor supports the increase in the Administration Charge.

Part 4: MATERIAL TO BE RELIED ON

1. Affidavit #1 of Craig Munro, made January 22, 2025;
2. Affidavit #1 of Mia Laity, made January 21, 2025;
3. First Report of the Monitor dated and filed June 8, 2022;
4. Second Report of the Monitor dated and filed June 24, 2022;
5. Third Report of the Monitor dated and filed August 17, 2022;
6. Fourth Report of the Monitor dated November 28, 2022 and filed November 29, 2022;
7. Fifth Report of the Monitor dated and filed March 7, 2023;
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15. Thirteenth Report of the Monitor dated and filed June 7, 2024;
16. Fourteenth Report of the Monitor dated July 8, 2024 and filed July 9, 2024;
17. Fifteenth Report of the Monitor dated and filed August 7, 2024;
18. Sixteenth Report of the Monitor dated and filed August 29, 2024;
19. Seventeenth Report of the Monitor dated and filed September 16, 2024;
20. Eighteenth Report of the Monitor dated and filed October 8, 2024;
21. Nineteenth Report of the Monitor dated October 16, 2024 and filed October 17, 2024;
22. Twentieth Report of the Monitor dated November 18, 2024 and filed November 19, 2024;
23. Supplement to the Twentieth Report of the Monitor dated December 1, 2024 and filed December 2, 2024;

24. Twenty-First Report of the Monitor dated December 12, 2024 and filed December 13, 2024;
25. Twenty-Second Report of the Monitor dated January 12, 2025 and filed January 13, 2025; and
26. Twenty-Third Report of the Monitor dated January 20, 2025 and filed January 20, 2025.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this notice of application, you must, within 5 business days after service of this notice of application or, if this application is brought under Rule 9-7, within 8 business days after service of this notice of application,

- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed application response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated: January 22, 2025



Signature of David E. Gruber

Applicant Lawyer for applicant

THIS NOTICE OF APPLICATION is prepared and delivered by David E. Gruber of the firm Bennett Jones LLP, Barristers & Solicitors, counsel for the Monitor, File No. 076142.14, whose place of business and address for delivery is 2500 – 666 Burrard Street, Vancouver, British Columbia, V6C 2X8. Telephone: (604) 891-7500. Facsimile: (604) 891-5100. [gruberd@bennettjones.com]

To be completed by the court only:

Order made

- in the terms requested in paragraphs _____ of Part 1 of this notice of application
- with the following variations and additional terms:

Dated: _____

Signature of Judge Associate Judge

Appendix

[The following information is provided for data collection purposes only and is of no legal effect.]

THIS APPLICATION INVOLVES THE FOLLOWING:

[Check the box(es) below for the application type(s) included in this application.]

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matter concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts

SCHEDULE "A"

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

Service List

(Last Updated: January 21, 2025)

<p>DLA Piper (Canada) LLP Suite 2800, Park Place 666 Burrard St. V6C 2Z7 Vancouver, BC</p> <p>Attention: Colin D. Brousson Jeffrey D. Bradshaw</p> <p>Email: colin.brousson@dlapiper.com jeffrey.bradshaw@dlapiper.com dannis.yang@dlapiper.com</p> <p>Telephone: 604.643.6400 604.643.2941</p> <p><i>Counsel for the Petitioner</i></p>	<p>FTI Consulting Canada Inc. Suite 1450, P.O. Box 10089 701 West Georgia St. Vancouver, BC V7Y 1B6</p> <p>Attention: Craig Munro Hailey Liu</p> <p>Email: Craig.Munro@fticonsulting.com Hailey.Liu@fticonsulting.com</p> <p>Telephone: 604.757.6108 403.454.6040</p> <p><i>Monitor</i></p>
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<p>Bennett Jones LLP 666 Burrard Street, Suite 2500 Vancouver, BC V6C 2X8</p> <p>Attention: David E. Gruber Mia Laity</p> <p>Email: gruberd@bennettjones.com laitym@bennettjones.com morenoe@bennettjones.com</p> <p>Telephone: 604.891.5150</p> <p><i>Counsel for the Monitor</i></p>	<p>Dentons 250 Howe St. 20th Floor Vancouver, BC V6C 3R8</p> <p>Attention: Jordan Schultz Eamonn Watson</p> <p>Email: jordan.schultz@dentons.com eamonn.watson@dentons.com avic.arenas@dentons.com chelsea.denton@dentons.com</p> <p>Telephone: 604.691.6452 604.629.4997</p> <p><i>Counsel for China Shougang International Trade & Engineer Corporation</i></p>
<p>Harper Grey LLP 650 W Georgia St #3200 Vancouver, BC V6B 4P7</p> <p>Attention: Erin Hatch Roselle Wu</p> <p>Email: ehatch@harpergrey.com rwu@harpergrey.com</p> <p>Telephone: 604.895.2818</p> <p><i>Counsel for Canada Zhonghe Investment Ltd.</i></p>	<p>Fasken 1500 – 1055 W Georgia St. Vancouver, BC V6E 4N7</p> <p>Attention: Kibben Jackson Mihai Tomos</p> <p>Email: kjackson@fasken.com mtomos@fasken.com</p> <p>Telephone: 604.631.4786 403.261.7386</p> <p><i>Counsel for Canadian Kailuan Dehua Mines Co., Ltd.</i></p>
<p>Lawson Lundell LLP Suite 1600 Cathedral Place 925 W Georgia St. Vancouver, BC V6C 3L2</p> <p>Attention: William L. Roberts</p> <p>Email: wroberts@lawsonlundell.com</p> <p>Telephone: 604.631.9163</p> <p><i>Counsel for Accurate Court Bailiff Services Ltd.</i></p>	<p>Weiheng Law 16th Floor, Tower A, China Technology Trading Building No. 66 North Fourth Ring West Road, Haidian District, Beijing</p> <p>Attention: Wei Heng</p> <p>Email: weiheng@weihenglaw.com</p> <p>Telephone: +86-10-62684688</p> <p><i>Counsel for Feicheng Mining Co., Ltd</i></p>

<p>BLG 1200 Waterfront Centre, 200 Burrard St., P.O. Box 48600, Vancouver, BC, Canada V7X 1T2</p> <p>Attention: Ryan Laity Jennifer Pepper</p> <p>Email: RLaity@blg.com JPepper@blg.com</p> <p>Telephone: 604.632.3544</p> <p><i>Counsel for Huiyong Holdings (BC) Ltd.</i></p>	<p>Fasken Martineau DuMoulin LLP 550 Burrard Street, Suite 2900 Vancouver, BC V6C 0A3</p> <p>Attention: Fergus McDonnell Johanna Fipke</p> <p>Email: fmcdonnell@fasken.com jfipke@fasken.com</p> <p>Telephone: 604.631.3220</p> <p><i>Counsel for Staray Capital Limited</i></p>
<p>McMillan LLP Royal Centre, 1055 W. Georgia Street, Suite 1500 PO Box 11117 Vancouver, BC, Canada V6E 4N7</p> <p>Attention: Daniel Shouldice</p> <p>Email: Daniel.Shouldice@mcmillan.ca</p> <p>Telephone: 604.691.6858</p> <p><i>Counsel for HD Mining International Ltd.</i></p>	<p>Fraser Litigation Group 570 Granville Street, #1100 Vancouver, BC V6C 3P1</p> <p>Attention: R. Barry Fraser Helen Liu</p> <p>Email: bfraser@fraserlitigation.com hliu@fraserlitigation.com</p> <p>Telephone: 604.343.3101</p>
<p>THC Lawyers Suite 2130, P.O. Box 321 Toronto, ON M5K 1K7</p> <p>Attention: Ran He</p> <p>Email: rhe@thclawyers.ca</p> <p>Telephone: 647.792.7798</p> <p><i>Counsel for Feicheng Mining Group Co., Ltd.</i></p>	<p>Department of Justice Canada British Columbia Regional Office 900 – 840 Howe Street Vancouver, BC V6Z 2S9</p> <p>Attention: Aminollah Sabzevari Julio Paoletti</p> <p>Email: Aminollah.Sabzevari@justice.gc.ca Julio.Paoletti@justice.gc.ca Khanh.Gonzalez@justice.gc.ca</p> <p>Telephone: 587.930.5282</p> <p><i>Counsel for His Majesty the King in Right of Canada</i></p>

<p>McEwan Cooper Kirkpatrick LLP 900 – 980 Howe Street Vancouver, BC V6Z 0C8</p> <p>Attention: Bob Cooper, K.C.</p> <p>Email: rcooper@mcewanpartners.com</p> <p>Telephone: 604.283.7677</p> <p><i>Counsel for Aref Amanat</i></p>	<p>Nathanson, Schachter & Thompson LLP 750 – 900 Howe Street Vancouver, BC V6Z 2M4</p> <p>Attention: Stephen Schachter, K.C. Julia Lockhart</p> <p>Email: SSchachter@nst.ca jlockhart@nst.ca</p> <p>Telephone: 778.945.1470 604.662.8840</p> <p><i>Counsel for West Moberly First Nation</i></p>
<p>Dennis Dawson James Aitken LLP 770 – 666 Burrard Street Vancouver, BC V6C 2X8</p> <p>Attention: Scott Dawson</p> <p>Email: sdawson@diacounsel.com</p> <p>Telephone: 604.659.9487</p> <p><i>Counsel for Karen Fellowes, K.C.</i></p>	<p>Canada Revenue Agency C/O N.Sindu (462-11) 9755 King George Blvd. Surrey, BC, V3T 5E6</p>
<p>Bullmoose Mining Ltd 3577 West 34Th Ave Vancouver BC, V6N 2K7</p>	<p>Canadian Dehua Lvliang International Mines Corp. 310-1155 Pender St. West Vancouver, BC V6E 2P4</p>
<p>CIBC – CEBA 400 Burrard Street Vancouver, BC V6C 3M5</p>	

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2024; Eighteenth Report of the Monitor filed October 8, 2024; Nineteenth Report of the Monitor filed October 17, 2024; Twentieth Report of the Monitor filed November 19, 2024; Supplement to the Twentieth Report of the Monitor filed December 2, 2024; Twenty-First Report of the Monitor filed December 13, 2024; Twenty-Second Report of the Monitor filed January 13, 2025; and Twenty-Third Report of the Monitor filed January 20, 2025 (collectively, the “**Monitor’s Reports**”), the Affidavit #1 of Craig Munro and Affidavit #1 of Mia Laity; AND pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 as amended (the “**CCAA**”), the *British Columbia Supreme Court Civil Rules*, and the inherent jurisdiction of this Honourable Court;

THIS COURT ORDERS that:

1. the conduct and activities of the Monitor as described in the Monitor’s Reports, are hereby approved;
2. the fees and disbursements of the Monitor (including estimated fees until the completion of these proceedings) as summarized in the Monitor’s Reports and as set out in Affidavit #1 of Craig Munro, are hereby approved;
3. the fees and disbursements of Bennett Jones LLP (“Bennett Jones”) (including estimated fees until the completion of these proceedings) in its capacity as counsel to the Monitor, as summarized in the Monitor’s Reports and set out in Affidavit #1 of Mia Laity, are hereby approved;
4. the Administration Charge as provided for in paragraph 31 of the Seventh Amended and Restated Initial Order dated October 9, 2024 is hereby increased from \$350,000 to \$700,000; and

5. endorsement of this order by counsel appearing, other than counsel for the Monitor, is hereby dispensed with.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

BY THE COURT

Signature of David E. Gruber

Party Lawyer for Monitor

REGISTRAR

No. S-235026
Vancouver Registry

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CANADIAN DEHUA INTERNATIONAL MINES GROUP INC., WAPITI COKING
COAL MINES CORP. and CANADIAN BULLMOOSE MINES CO., LTD.

PETITIONERS

ORDER MADE AFTER APPLICATION

BENNETT JONES LLP
Barristers and Solicitors
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Vancouver, B.C. V6C 2X8

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Fax: 604-891-5100

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File No. 076142.00014