



This is the 2nd affidavit  
of Ashley Kumar in this case  
and was made on December 9, 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.

PETITIONER

**AFFIDAVIT**

I, Ashley Kumar, Legal Assistant of Suite 2700 - 1133 Melville Street, Vancouver, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am an employee of the firm of DLA Piper (Canada) LLP, counsel for the Petitioner, Canadian Dehua International Mines Group Inc. ("CDI"), in this action. I have personal knowledge of the facts and matters hereinafter deposed to in this Affidavit, except where they are stated to be made upon information and belief and where so stated I verily believe them to be true.
2. Attached hereto and marked as **Exhibit "A"** is a copy of a letter from Naishun Liu, Founder and Chairman of CDI, to the Judge, dated December 9, 2025.

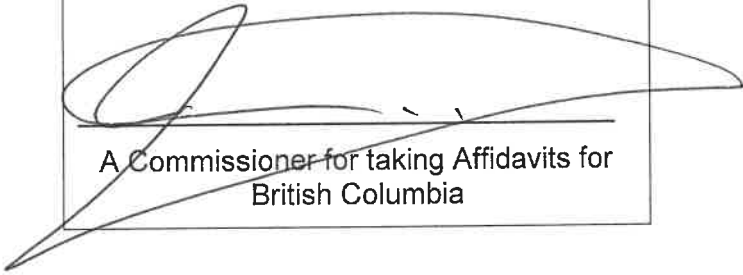
SWORN BEFORE ME at Vancouver, British Columbia, on December 9, 2025.

A Commissioner for taking Affidavits for British Columbia.

**Jeffrey Bradshaw**  
*Barrister & Solicitor*  
**DLA Piper (Canada) LLP**  
1133 Melville Street, Suite 2700  
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ASHLEY KUMAR

This is **Exhibit "A"** referred to in the 2<sup>nd</sup>  
Affidavit of Ashley Kumar, sworn before  
me at Vancouver, British Columbia, on this  
9<sup>th</sup> day of December, 2025.



A Commissioner for taking Affidavits for  
British Columbia

## 致法官的一封信函

尊敬的法官先生您好！我是加拿大德华国际矿业集团的创始人和董事长刘乃顺，今天特向您致函如下：

我 2003 年投资移民加拿大，全家定居温哥华，2004 创立加拿大德华国际矿业集团公司，引进中国首钢集团、河北钢铁集团、河北开滦集团、山东能源肥矿集团等四家国有特大型企业以及北京汇永集团（著名私营企业）和德华公司共同勘探开发 BC 省的主焦煤田。

由于中加两国关系的变化以及中国政府对外投资政策的改变，导致了上述这些公司几乎同时停止了对这些项目的投资，而且要求德华公司退还他们全部投资款和合作保证金，这才导致了德华公司的被迫破产。此外，我本人于 2022 年 7 月 28 日回中国探望年近九旬的老母亲时被限制离开中国，至今已经 40 多个月，依然回不到加拿大。加拿大驻北京大使馆也多次致电给我本人，关系和问询我的在华情况。

德华公司今天面临破产的墨玉河煤田项目早在五年前就已经获得了建设年产 600 万吨矿井的全部许可，而且还获得了建设矿山而引进矿工的许可证，其中开滦和汇永的 300 多名矿工都获得了赴加拿大的工作签证。

墨玉河项目的勘探、环评、设计以及斜井施工和建设工业广场就投资了三亿多美元，但目前德华在 HD 公司间接占有的股份拍卖最高价才仅 360 万元，这等于墨玉河煤田项目以及 HD 公司的价值还不足 1800 万元。

很显然，德华的股份被远远贱卖了，而且还不足债权人合法权益的 10%。这令我非常痛心和深感遗憾！

尊敬的法官，为了公平正义而且极大地保护债权人的合法权益，我特恳请您批准我的如下请求！

- 一、我保证在 30 个工作日内全部还清法庭认定的债权人的全部金额
- 二、也愿意在 30 个工作日后支持法庭竞拍，价高者获得相关权益。

致礼！

加拿大德华国际矿业集团公司  
董事长 刘乃顺

2025 年 12 月 9 日于中国山西

### Letter to the Judge

Dear Honorable Judge, my name is Naishun Liu, the founder and chairman of Canadian Dehua International Mines Group Inc. ("CDI"). I wish to write to you with respect to the following:

I immigrated to Canada through the Investor Immigration Program in 2003 and settled in Vancouver with my family. In 2004, I founded CDI and brought four large state-owned enterprises, namely Shougang Group, Hebei Iron and Steel Group, Hebei Kailuan Group, and Shandong Energy Feicheng Mining Group, as well as Beijing Huiyong Group Co., Ltd. (a well-known private enterprise), to work together to explore and develop the hard coking coal projects in British Columbia.

Due to changes in the Sino-Canadian relationship and the Chinese government's foreign investment policy, the aforementioned companies ceased their investments almost simultaneously and all demanded that CDI return all their investment capital and repay their cooperation deposits, forcing CDI into insolvency. Furthermore, I was restricted from leaving China when I returned on July 28, 2022 to visit my nearly 90-year-old mother. More than 40 months have passed since then, and I still cannot return to Canada. The Canadian Embassy in Beijing has also called me multiple times to inquire about my situation in China.

The Murry River Project that CDI worked on, which is one of the subjects of the present insolvency proceeding, already obtained all the necessary permits to build a mine with an annual output of 6 million tons five years ago. It also obtained clearance for bringing in miners for the construction of the mining project, and over 300 miners from Kailuan and Huiyong were already issued the working permits for working in Canada.

The exploration, environmental impact assessment, design, inclined shaft construction, and industrial plaza construction of the Murry River Project have cost more than 300 million US dollars. However, the highest auction price for the shares indirectly held by CDI in HD Mining Company is only for 3.6 million dollars, valuing the Murry River Project and the HD Company at less than 18 million dollars.

Clearly, CDI's shares have been sold for far below the market value, worth less than 10% of the creditor's claims. I find this extremely painful and deeply regrettable!

Dear Honorable Judge, in order to ensure fairness and justice, and to maximize the protection for the legitimate rights and interests of creditors, I earnestly request that you grant my following requests:

- (1) I assure that all of the debt as confirmed by the court will be paid off within 30 business days; and
- (2) I am also willing to support the court organized auction after 30 business days, with the highest bidder obtaining the relevant rights and interests.

Regards,

Canadian Dehua International Mines Group Inc.

Chairman: Naishun Liu

December 9, 2025, in Shanxi, China

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