



No. S-224444
Vancouver Registry

JAN 08 2026 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

NOTICE OF APPLICATION

Name of applicant: the Petitioner

To: the Service List (attached hereto as **Schedule "A"**)

TAKE NOTICE that an application will be made by the applicant to the Honourable Mr. Justice Walker at the courthouse at 800 Smithe Street, Vancouver, BC, V6Z 2E1 on January 9, 2026 at 10:00 a.m. for the orders set out in Part 1 below.

The applicant estimates that the application will take 1 day.

This matter is not within the jurisdiction of an Associate Judge.

Part 1: ORDER(S) SOUGHT

1. An Order extending the stay of proceedings (the "**Stay of Proceedings**") granted in the Seventh Amended and Restated Initial Order dated October 9, 2024 (the "**Seventh ARI**") up to and including February 20, 2026, substantially in the form attached hereto as **Schedule "B"**; and
2. Such other relief as this Honourable Court may deem just.

Part 2: FACTUAL BASIS

1. Pursuant to an order (the "**Initial Order**") of the Supreme Court of British Columbia (the "Court") made on June 3, 2022, CDI was granted protection under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), and FTI

Consulting Canada Inc. ("FTI") was appointed monitor (and in such capacity, the "Monitor").

2. The Initial Order also provided an initial stay of proceedings until June 9, 2022. The Stay of Proceedings has been extended several times during the course of these proceedings and pursuant to an order dated July 28, 2025 (the "July 28 Order"), was extended to January 15, 2026.

Background

3. CDI is a company that invests in, and operates, mining assets in British Columbia. CDI was incorporated in 2004 in order to develop underground core mining properties.
4. CDI primarily cooperated on mining projects with major Chinese mining companies and steel factories as partners. However, for various reasons, a number of the projects did not proceed as planned. This has resulted in significant debt and limited revenue while CDI finds new buyers and develops new mining projects.
5. Until March 25, 2025, CDI wholly owned two mining projects, including:
 - (a) the Wapiti River coal project (the "**Wapiti Project**"), where CDI is the sole shareholder of the company that owns and operates the project, Wapiti Coking Coal Mines Corporation ("**WCCMC**"). The Wapiti Project is a large-scale underground mine at the senior exploration stage located near Tumbler Ridge, British Columbia; and
 - (b) the Bullmoose coalfield exploration project (the "**Bullmoose Project**") located near Tumbler Ridge, British Columbia.
6. CDI's remaining assets include, among other things, a 50% interest in Canadian Dehua Lvliang International Mining Inc., which owns a 40% interest in HD Mining International Limited ("**HDL**"). HDL owns the Murray River project which involves the construction, operation and decommissioning of an underground coal mine and supporting infrastructure located near Tumbler Ridge, British Columbia (the "**Murray River Project**"). As a result, CDI has a 20.4% indirect interest in the Murray River Project.

7. By an order of the Court dated December 9, 2025, a sale of CDI's interest in the Murray River Project was approved. The Petitioner's counsel is currently in the process of closing the approved Asset Purchase Agreement.
8. In addition to the Murray River Project, CDI owns:
 - (a) the Iron Ross Project, 100 common shares in Canada Dehua Drilling Ltd. and 80 common shares in Vancouver Island Iron Ore Corporation (collectively, the "**Residual Assets**") and
 - (b) a 24% interest in Canadian Kailuan Dehua Mines Co., Ltd. ("**CKD**").
9. By an order of the Court dated December 9, 2025, a vesting order was granted for the sale of the Residual Assets to the Interim Lender (as hereinafter defined). The Petitioner's counsel is currently in the process of closing the approved Asset Purchase Agreement.

The Interim Lender

10. On June 9, 2022, CDI sought and obtained an Order approving an debtor-in-possession credit facility from Qu Bo Liu, a shareholder of CDI (in such capacity, the "**Interim Lender**") in the maximum amount of \$350,000 (the "**Interim Financing Facility**"). Since the commencement of the proceedings, the Interim Financing Facility and the Interim Lender's Charge was increased on a number of occasions.
11. In accordance with the July 28 Order, the Interim Financing Facility was amended to permit one advance of \$400,000 unless otherwise permitted by further order of this Court. The maximum amount of the Interim Lender's Charge was also limited to \$400,000.

CKD Tax Indemnity Claim

12. There are two other shareholders in CKD, namely, Shougang International Canada Investment Ltd., an affiliate of Shougang International (25%) and Canada Zhonghe Investment Ltd. (51%).
13. After the formation of the CKD joint venture, CDI agreed to indemnify CKD for any losses it might suffer as a result of CDI's transfer, on a tax rollover basis, of a mine site in northeastern British Columbia known as the Gething Coal Project to a joint venture the

"CKD Indemnity Claim"). CKD registered a security interest over CDI's shares in CKD in support of the CKD Indemnity Claim. CDI disputes the CKD Indemnity Claim.

14. CKD was excluded from filing a proof of claim pursuant to the Claims Process Order, however, the determination of the validity and quantum of the CKD Indemnity Claim will provide valuable information to CDI and the Monitor on the next steps in these proceedings in respect of the CKD joint venture. CKD has agreed to file a proof of claim by February 6, 2026.
15. The Petitioner seeks an extension of the Stay to facilitate the closing the sale transactions for the Residual Assets and the Murray River Project and to allow the Monitor to develop a budget to resolve the CKD Indemnity Claim and advance these proceedings to a conclusion.

Part 3: LEGAL BASIS

1. The Petitioner relies on:
 - (a) the CCAA;
 - (b) *Supreme Court Civil Rules*, in particular Rules 8-1, 13-1, and 22-4;
 - (c) the inherent and equitable jurisdiction of this Court; and
 - (d) such further and other legal bases and authorities as counsel may advise and this Court may permit.

Extension of the Stay of Proceedings is Appropriate

2. Subsection 11.02(2) of the CCAA provides that the Petitioner may apply for an extension of the stay of proceedings for a period that a court considers necessary on any terms that a court may impose. Subsection 11.02(3) of the CCAA provides that the Court shall not make the order extending the stay of proceedings unless:
 - (a) the applicant satisfies the Court that circumstances exist that make the order appropriate; and
 - (b) in the case of an order under subsection (2), the applicant also satisfies the Court that the applicant has acted, and is acting, in good faith and with due diligence.

CCAA s. 11.02.

3. In determining whether the appropriate circumstances exist to extend the Stay of Proceedings, the Court should inquire whether the order sought advances the remedial purpose of the CCAA.

North American Tungsten Corp. (Re), 2015 BCSC 1376 at para. 25.

4. Extending the relief granted by the Initial Order, as amended and restated, including the Stay of Proceedings, is appropriate and necessary to enable the Petitioner to complete the next steps in these proceedings, which is in the best interest of the stakeholders.
5. The Petitioner has been acting in good faith and with due diligence and no stakeholder will be materially prejudiced by the extension of the Stay of Proceedings.
6. The Petitioner submits that, in these circumstances, it is necessary and appropriate that the Stay of Proceedings be extended to February 20, 2026, or any alternative date which the Court sees fit.

Part 4: MATERIAL TO BE RELIED ON

1. Twenty Eighth Report of the Monitor, to be filed; and
2. Any such further materials as counsel advises and this Honourable Court permits.

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 8, 2026


Signature of lawyer for filing party
DLA Piper (Canada) LLP (Jeffrey D. Bradshaw)
Lawyer for the Petitioner

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:

Date: _____

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:

- discovery: comply with demand for documents
- discovery: production of additional documents
- oral 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
- none of the above

Schedule “A”

(Service List)

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AND

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DEHUA INTERNATIONAL MINES GROUP INC.

PETITIONER

Service List

(Last Updated: December 5, 2025)

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Schedule “B”

(Draft Order)

No. S-224444
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IN THE SUPREME COURT OF BRITISH COLUMBIA

THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
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CANADIAN DEHUA INTERNATIONAL MINES GROUP INC.

PETITIONER

ORDER MADE AFTER APPLICATION

BEFORE)	THE HONOURABLE JUSTICE WALKER)	JANUARY 9, 2026
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))	

ON THE APPLICATION of the Petitioner coming on for hearing at 800 Smithe Street, Vancouver, BC V6Z 2E1 on January 9, 2026 and on hearing ♦, counsel for the Petitioner and those other counsel listed on Schedule "A" hereto; AND UPON READING the material filed herein, including the Twenty Eighth Report of FTI Consulting Canada Inc., in its capacity as monitor of the Petitioner (the "**Monitor**") filed January ♦, 2026; 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; and further to the Initial Order pronounced by this Court on June 3, 2022 (the "**Initial Order**") as revised, amended and restated from time to time including pursuant to the Amended and Restated Initial Order pronounced by this Court on June 9, 2022 (the "**ARIO**"), as amended from time to time; including the Seventh Amended and Restated Initial Order pronounced by this Court on October 9, 2024 (the "**Seventh ARI**");

THIS COURT ORDERS that:

SERVICE

1. The time for service of the Notice of Application for this order and the supporting materials thereof is hereby abridged so that this application is properly returnable today and further service thereof is hereby dispensed with.

EXTENSION OF STAY OF PROCEEDINGS

2. The stay of proceedings set out in paragraph 15 of the Seventh ARIO is hereby extended up to and including February 20, 2026.

GENERAL

3. This Order and all of its provisions are effective as of 12:01 a.m. local Vancouver time on the date hereof.
4. Endorsement of this Order by counsel and any unrepresented parties appearing on this application, other than counsel for the Petitioner, 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:

Signature of lawyer for the Petitioners
DLA Piper (Canada) LLP (♦)

BY THE COURT

REGISTRAR

SCHEDULE "A"

NAME OF COUNSEL	PARTY REPRESENTING

No. S-224444
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ORDER MADE AFTER APPLICATION

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JDB/

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