

FORCE FILED

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

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 March 11, 2026 at 9:00 a.m. for the orders set out in Part 1 below.

The applicant estimates that the application will take ~~1~~ ^{45 minutes} hour.

This matter is not within the jurisdiction of an Associate Judge. Justice Walker will be hearing this matter. The date and time for this Application has been confirmed with Supreme Court Scheduling.

Part 1: ORDER(S) SOUGHT

1. An Order, substantially in the form attached hereto as **Schedule "B"**:
 - (a) extending the stay of proceedings (the "**Stay of Proceedings**") granted in the Seventh Amended and Restated Initial Order dated October 9, 2024 up to and including June 30, 2026,
 - (b) approving the budget for the resolution of the CKD Indemnity Claim (as hereinafter defined) not to exceed \$100,000, pending further approval of this Honourable Court, and

- (c) declaring that, if the CKD Indemnity Claim has not been resolved consensually by June 15, 2026, that Canadian Kailuan Dehua Mines Co., Ltd. (“CKD”) will bring an application for a declaration with respect to the validity and quantum of its claim against CDI; 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, Canadian Dehua International Mines Group Inc. (“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 as monitor (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 February 19, 2026, was extended to March 13, 2026.

Background

3. CDI is a company that invested in, and operated, 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 resulted in significant debt and limited revenue for CDI.
5. On March 28, 2025, CDI closed the sale of two wholly-owned two mining projects located near Tumbler Ridge, British Columbia to West Moberly First Nation, namely, (i) the Wapiti River coal project, a large-scale underground mine at the senior exploration stage; and (ii) the Bullmoose coalfield exploration project located near Tumbler Ridge, British Columbia.
6. CDI’s assets included, 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**"). On February 11, 2026, CDI closed the sale of its 20.4% indirect interest in the Murray River Project to 1562880 B.C. Ltd.

Remaining Assets

7. CDI's remaining assets include:
 - (a) the Iron Ross Project, 100 common shares in Canada Dehua Drilling Ltd. and 80 common shares in Vancouver Island Iron Ore Corporation ("**VIIOC**") (collectively, the "**Residual Assets**") and
 - (b) a 24% interest in CKD.
8. 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 "**Residual Asset Transaction**"). The parties are currently in the process of closing the Residual Asset Transaction with the only outstanding item being the transfer of the mineral claims from CDI to the Interim Lender. It is anticipated that this step will be completed prior to the hearing of the within application.

The Interim Lender

9. 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.
10. In accordance with an Order of this Court dated July 28, 2025, 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.
11. Upon the closing of the Residual Assets Transaction, the Interim Lender will be repaid in full for all advances made under the Interim Financing Facility.

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 exempted from filing a proof of claim pursuant to the Claims Process Order granted by this Court on June 28, 2022 (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.
15. CKD provided its proof of claim to the Monitor on February 13, 2026. The Monitor has requested further information from CKD to evaluate the CKD Indemnity Claim and following the receipt of such information, CKD and the Monitor will attempt to resolve the claim on a consensual basis. If a consensual resolution is not possible, the determination of the CKD Indemnity Claim will be brought before this Honourable Court.
16. As directed by the Order of this Honourable Court dated July 25, 2025, the Monitor is seeking the approval of a budget for the resolution of the CKD Indemnity Claim, not to exceed \$100,000, pending further approval of the Court.

Extension of Stay of Proceedings

17. The Petitioner seeks an extension of the Stay of Proceedings to facilitate the closing the sale transaction for the Residual Assets and to allow the Monitor to attempt 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.

Approval of the CKD Indemnity Claim Budget is Appropriate

2. On July 25, 2025, this Honourable Court granted an order which provided as follows:
 9. The Monitor's powers under the Claims Process Order shall be expanded to include the power to resolve the Claim of CKD on behalf of CDI, with costs not to exceed a budget to be approved by the Court (but for certainty the Monitor shall not adjudicate the Claim of CKD).
3. The Monitor is seeking the approval of a budget for the resolution of the CKD Indemnity Claim, not to exceed \$100,000, pending further approval of the Court.

Extension of the Stay of Proceedings is Appropriate

4. 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.

5. 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.

6. 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 interests of the stakeholders.
7. 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.
8. The Petitioner submits that, in these circumstances, it is necessary and appropriate that the Stay of Proceedings be extended to June 30, 2026, or any alternative date which the Court sees fit.

Part 4: MATERIAL TO BE RELIED ON

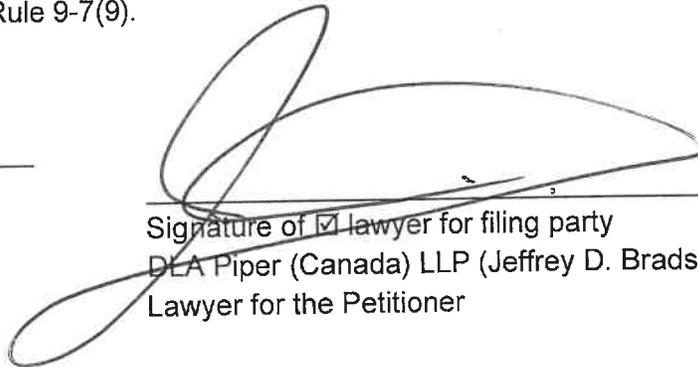
1. Thirtieth Report of the Monitor, to be filed; and
2. Any such further materials as counsel advises and this Honourable Court permits.

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).

March 6, 2026
Dated



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)

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
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AND

IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF CANADIAN
DEHUA INTERNATIONAL MINES GROUP INC.

PETITIONER

Service List

(Last Updated: December 5, 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, Canadian Dehua International Mines Group Inc.</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>McEwan Cooper Kirkpatrick LLP 900 – 980 Howe Street Vancouver, BC V6Z 0C8</p> <p>Attention: David E. Gruber William Stransky Mila Ghorayeb</p> <p>Email: dgruber@mcewanpartners.com wstransky@mcewanpartners.com mghorayeb@mcewanpartners.com</p> <p>Telephone: (604) 283-8051 (604) 283-8065 (778) 383-7274</p> <p><i>Counsel for the Monitor, FTI Consulting Canada Inc.</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><i>Counsel for Qu Bo Liu</i></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>McMillan LLP PO Box 11117, #1500 - 1055 W. Georgia Street Vancouver, BC V6E 4N7</p> <p>Attention: Bernhard J. Zinkhofer</p> <p>E-mail: Bernhard.Zinkhofer@mcmillan.ca</p> <p>Telephone: (604) 691-7483</p> <p><i>Counsel for HBIS Group International Holding Co., Ltd. ("HBIS")</i></p>	<p>Clark Wilson LLP 900-885 West Georgia Street Vancouver, BC V6C 3H1</p> <p>Attention: Christopher Ramsay Simon Wu</p> <p>E-mail: CRamsay@cwilson.com SWu@cwilson.com</p> <p>Telephone: (604) 643-3176</p> <p><i>Counsel for 1562880 B.C. Ltd.</i></p>
<p>Canada Revenue Agency C/O N.Sindu (462-11) 9755 King George Blvd. Surrey, BC, V3T 5E6</p>	<p>CIBC – CEBA 400 Burrard Street Vancouver, BC V6C 3M5</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>

Email distribution list:

colin.brousson@dlapiper.com; jeffrey.bradshaw@dlapiper.com;
dannis.yang@dlapiper.com; Craig.Munro@fticonsulting.com;
Hailey.Liu@fticonsulting.com; dgruber@mcewanpartners.com;
wstransky@mcewanpartners.com; mghorayeb@mcewanpartners.com;
pshariati@mcewanpartners.com; cron@mcewanpartners.com;
sishida@mcewanpartners.com; jordan.schultz@dentons.com;
eamonn.watson@dentons.com; avic.arenas@dentons.com;
chelsea.denton@dentons.com; ehatch@harpergrey.com; rwu@harpergrey.com;
kjackson@fasken.com; mtomos@fasken.com; wroberts@lawsonlundell.com;
RLaity@blg.com; JPepper@blg.com; weiheng@weihenglaw.com;
Daniel.Shouldice@mcmillan.ca; fmcdonnell@fasken.com; jfipke@fasken.com;
bfraser@fraserlitigation.com; hliu@fraserlitigation.com; rhe@thclawyers.ca;
Aminollah.Sabzevari@justice.gc.ca; Julio.Paoletti@justice.gc.ca;
Khanh.Gonzalez@justice.gc.ca; rcooper@mcewanpartners.com;
lansari@mcewanpartners.com; SSchachter@nst.ca; jlockhart@nst.ca; rrabey@nst.ca;
mcreamore@nst.ca; Bernhard.Zinkhofer@mcmillan.ca; melinda.yee@mcmillan.ca;
CRamsay@cwilson.com; SWu@cwilson.com; JLanda@cwilson.com;

Schedule "B"

(Draft Order)

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

ORDER MADE AFTER APPLICATION

BEFORE)	THE HONOURABLE JUSTICE P. WALKER)	MARCH 11, 2026
))	
))	
))	

ON THE APPLICATION of the Petitioner coming on for hearing at 800 Smithe Street, Vancouver, BC V6Z 2E1 on March 11, 2026 and on hearing Jeffrey Bradshaw, counsel for the Petitioner and those other counsel listed on Schedule "A" hereto; AND UPON READING the material filed herein, including the Thirtieth Report of FTI Consulting Canada Inc., in its capacity as monitor of the Petitioner (the "**Monitor**") filed March 11, 2026 (the "**Thirtieth Report**"); AND pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985 c. C-36 as amended (the "**CAA**"), 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 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, as amended from time to time; including the Seventh Amended and Restated Initial Order pronounced by this Court on October 9, 2024 (the "**Seventh ARIO**");

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 June 30, 2026.

CKD INDEMNITY CLAIM

3. The Monitor's budget for a potential consensual resolution of the CKD Indemnity Claim (as defined in the Notice of Application) shall be a maximum of \$100,000, pending further approval of this Honourable Court.
4. In the event that the CKD Indemnity Claim had not been resolved consensually by June 15, 2026, Canadian Kailuan Dehua Mines Co., Ltd will bring an application for a declaration with respect to the validity and quantum of its claim against the Petitioner.

GENERAL

5. This Order and all of its provisions are effective as of 12:01 a.m. local Vancouver time on the date hereof.
6. 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 (Jeffrey Bradshaw)

BY THE COURT

REGISTRAR

SCHEDULE "A"

NAME OF COUNSEL	PARTY REPRESENTING
Jeffrey Bradshaw	Canadian Dehua International Mines Group Inc.
David Gruber	FTI Consulting Inc., the Monitor
R. Barry Fraser Helen Liu	Qu Bo Liu
Erin Hatch	Canada Zhonghe Investment Ltd.
Eamonn Watson	China Shougang International Trade & Engineering Corporation

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PETITIONER

ORDER MADE AFTER APPLICATION

DLA Piper (Canada) LLP
Barristers & Solicitors
Suite 2700, The Stack
1133 Melville St
Vancouver, BC V6E 4E5

Tel. No. 604.687.9444
Fax No. 604.687.1612

File No.: 080762-00014

JDB/

No. S-224444
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IN THE MATTER OF THE COMPANIES' CREDITORS
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DLA Piper (Canada) LLP
Barristers & Solicitors
Suite 2700, The Stack
1133 Melville St
Vancouver, BC V6E 4E5

Tel. No. 604.687.9444
Fax No. 604.687.1612

File No.: 080762-00014

JDB/