

This is the 1st Affidavit of San Chan in this proceeding and it was made on January 10, 2025

No. S-224444
Vancouver Registry



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., WAPITI COKING COAL MINES CORP., AND CANADIAN BULLMOOSE MINES CO., LTD.

AFFIDAVIT

I, SAN CHAN, of 770-666 Burrard Street, Vancouver, British Columbia, Paralegal Assistant, AFFIRM THAT:

1. I am a Paralegal with the law firm of Dennis Dawson James Aitken LLP ("**DJA**"), counsel to the application respondent, Karen Fellowes, K.C. I have personal knowledge of the facts and matters I have deposed to except where stated to be based on information and belief, and where so stated, I verily believe the same to be true.
2. Attached hereto and marked as **Exhibit "A"** to my affidavit is a letter dated January 9, 2025 from Mr. Craig Dennis, K.C., counsel to Ms. Fellowes, to Mr. Barry Fraser, counsel to the applicant, Ms. Bo Qu Liu. I caused DJA to send Exhibit "A" to Mr. Fraser at 3:55 pm on January 9, 2025 by email at the address bfraser@fraserlitigation.com.
3. On January 9, 2025, I submitted an inquiry to Charest Report for an estimate of the time needed to prepare a transcript of a four-day hearing and received an estimate of three to four weeks.

AFFIRMED BEFORE ME at Vancouver,)
British Columbia on January 10, 2025)

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A commissioner for taking affidavits)
for British Columbia)



SAN CHAN

SCOTT DAWSON
Barrister & Solicitor
DENNIS DAWSON JAMES AITKEN LLP
770 - 666 Burrard Street
Vancouver, BC V6C 2X8
(604) 659-9487

From: [San Chan](#)
To: bfraser@fraserlitigation.com
Cc: jmarcello@fraserlitigation.com; [Craig Dennis](#); [Scott Dawson](#)
Subject: In the matter of Canadian Dehua International Mines Group Inc. et al. | SCBC Vancouver Registry Action No. S-224444
Date: January 9, 2025 3:55:00 PM
Attachments: [2021_01_09 LT B, Fraser.pdf](#)

Good afternoon:

Please find attached our correspondence dated January 9, 2025.

Kind regards,

San Chan
 (she/her)
 Paralegal

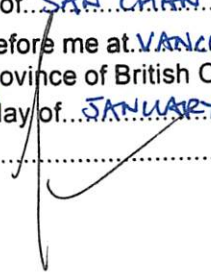
D: 604-659-9483
 E: schan@djacounsel.com

DENNIS | DAWSON | JAMES | AITKEN

770 – 666 Burrard Street, Vancouver, BC, V6C 2X8 | T: 604-659-9479 | www.djacounsel.com

This email and any accompanying attachments contain confidential information that may be subject to solicitor-client privilege and are intended only for the named recipients. If you have received this email in error, please notify the sender and destroy the email.

This is Exhibit "A" referred to in the
 affidavit of SAN CHAN
 sworn before me at VANCOUVER
 in the Province of British Columbia,
 this 10th day of JANUARY, 2025



January 9, 2025

Fraser Litigation Group
1100 – 570 Granville Street
Vancouver, BC V6C 1P3

Attention: R. Barry Fraser

Dear Sirs/Mesdames:

**Re: In the matter of Canadian Dehua International Mines Group Inc. et al.,
SCBC Vancouver Registry Action No. S-224444**

Dear Barry,

On Tuesday of this week we were retained to represent Karen Fellowes, K.C. of Stikeman Elliott for a costs application brought by your client, Qu Bo Liu. We are instructed that the application was served at Ms. Fellowes' office on Monday afternoon (January 6) and is returnable next Monday and Tuesday, January 13 and 14. (I also understand that an unfiled draft of the application was sent by email over the holidays but that, of course, is not service.)

Ms. Fellowes, of course, is not a party to the proceeding, and her limited involvement last year ended in November 2024. The allegations made against Ms. Fellowes are serious and appear to relate, in part to a hearing over four days this past October. Do you have the transcript of that hearing?

In the circumstances, we are hopeful that the parties can agree to adjourn the costs issue to a mutually convenient date that affords Ms. Fellowes a reasonable opportunity to respond that is necessary and, at minimum, that is permitted by the Supreme Court Civil Rules.

In the short period of our involvement, we have learned that the hearing dates next week were obtained to deal with approval of competing bids in the CCAA process, not for costs issues. Given the amount of hearing time required for the bid approval, it is unlikely that there would be time to deal with the costs issue in any event, even apart from the short notice. Further, the costs issue is discrete, severable and can proceed after the competing bids are addressed.

Could we impose on you for a response today on whether you agree to adjourn the costs application against Ms. Fellowes? In the meantime, we will try to get at least a basic application response together to file tomorrow, so please reserve a tab for that in the chambers record.

We reserve the right to bring our correspondence to the court's attention should we be unable to reach agreement on a mutually convenient new date that allows Ms. Fellowes adequate time to respond to your client's application.

Many thanks.

Yours truly,

Dennis Dawson James Aitken LLP



Craig Dennis, K.C.

604-659-9480

cdennis@djacounsel.com

CPD/sc