



This is the 3RD Affidavit
of XIAO LIU in this case
and was made on November 28, 2024

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.

Petitioners

AFFIDAVIT

I, Xiao (Helen) Liu, lawyer of 1100 – 570 Granville Street, Vancouver, British Columbia, SWEAR THAT:

1. I am an associate lawyer with Fraser Litigation Group, which represents Qu Bo Liu, the debtor-in-possession lender in these proceeding ("**Mrs. Liu**"), and as such have personal knowledge of the facts and matters herein deposed to save and except where the same are stated to be based on information and belief and where so stated I verily believe the same to be true.
2. Attached as **Exhibit "A"** hereto is a true copy of the Notice of Change of Address of TaneMahuta Capital Ltd. ("**TaneCap**") dated November 7, 2024, which shows its new registered and records office at 100 – 1515 West 7th Avenue, Vancouver, British Columbia, being the offices of the law firm Amanat Law.
3. Attached as **Exhibit "B"** hereto is a true copy of the Notice of Appointment or Change of Lawyer filed by TaneCap on November 15, 2024, in the within proceeding.
4. On November 19, 2024, a Judicial Management Conference took place in the within proceeding. Attached as **Exhibit "C"** hereto is a true copy of the Order of Justice Walker.
5. On November 22, 2024, R. Barry Fraser, counsel for Mrs. Liu, wrote to TaneCap's new counsel, Michael Feder, K.C., Lance Williams, Kevin Hanowski and Ashley Bowron regarding the allegations of unfairness and misconduct that would need to be withdrawn in exchange for

This is Exhibit "A" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia

Date and Time: November 21, 2024 10:28 AM Pacific Time



BC Registry Services

Mailing Address: PO Box 9431 Stn Prov Govt Victoria BC V8W 9V3 www.corporateonline.gov.bc.ca

Location: 2nd Floor - 940 Blanshard Street Victoria BC 1 877 526-1526

Notice of Change of Address

FORM 2
BUSINESS CORPORATIONS ACT
Sections 35 & 36

Filed Date and Time: **November 6, 2024 11:18 AM Pacific Time**
Effective Date and Time of Filing: **November 7, 2024 12:01 AM Pacific Time**

Incorporation Number:
BC1275988

Name of Company:
TANEMAHUTA CAPITAL, LTD.

REGISTERED OFFICE INFORMATION

Mailing Address:
SUITE 100 - 1515 WEST 7TH AVENUE
VANCOUVER BC V6J 1S1
CANADA

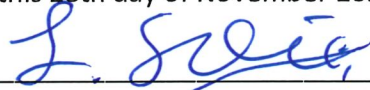
Delivery Address:
SUITE 100 - 1515 WEST 7TH AVENUE
VANCOUVER BC V6J 1S1
CANADA

RECORDS OFFICE INFORMATION

Mailing Address:
SUITE 100 - 1515 WEST 7TH AVENUE
VANCOUVER BC V6J 1S1
CANADA

Delivery Address:
SUITE 100 - 1515 WEST 7TH AVENUE
VANCOUVER BC V6J 1S1
CANADA

This is Exhibit "B" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia



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

PETITIONERS

NOTICE OF APPOINTMENT OR CHANGE OF LAWYER

TAKE NOTICE that Michael Feder, K.C., Lance Williams, Kevan Hanowski and Ashley Bowron of McCarthy Tétrault LLP, have been appointed to act as the lawyers for TaneMahuta Capital Ltd., in place of Karen Fellowes, K.C. of Stikeman Elliott LLP.

DATE: November 14, 2024


Counsel for TaneMahuta Capital Ltd.

McCarthy Tétrault LLP
(Michael Feder, K.C., Lance Williams,
Kevan Hanowski and Ashley Bowron)

Parties' address for service:

McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, BC V6E 0C5

**Attention: Michael Feder, K.C.
Lance Williams
Kevan Hanowski
Ashley Bowron**

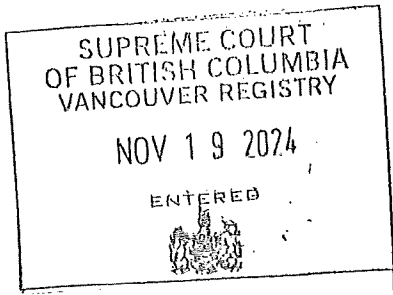
Email address for service:

mfeder@mccarthy.ca
lwilliams@mccarthy.ca
khanowski@mccarthy.ca
abowron@mccarthy.ca

This is Exhibit "C" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024

A handwritten signature in blue ink, appearing to be "L. J. ...", written over a horizontal line.

A Commissioner for taking Affidavits
within the Province of British Columbia



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.

PETITIONERS

ORDER MADE AFTER JUDICIAL MANAGEMENT CONFERENCE

BEFORE))	
)	THE HONOURABLE JUSTICE WALKER)	November 19, 2024
))	
))	

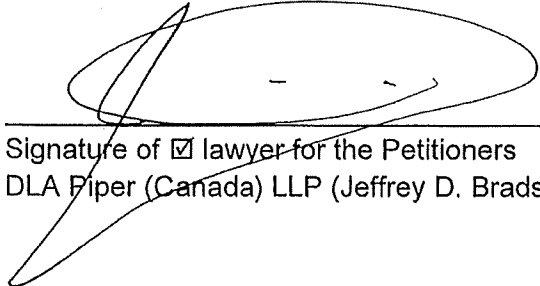
ON THE APPLICATION of the Petitioners coming on for hearing at 800 Smith Street, Vancouver, BC V6Z 2E1 on November 19, 2024, and on hearing Jeffrey D. Bradshaw and Holly Yuen, Articled Student, counsel for the Petitioners and those other counsel listed on Schedule "A" hereto; AND UPON READING the material filed herein, including the Twentieth Report of FTI Consulting Canada Inc., in its capacity as monitor of the Petitioner (the "**Monitor**") filed November 18, 2024; 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 ARIO**");

THIS COURT ORDERS that:

1. Notice of Application filed on November 15, 2024, and Notice of Application filed on October 15, 2024, to be heard on January 13 and 14, 2025;
2. The cross-examination of Aref Amanat take place no later than December 16, 2024;
3. A hearing shall be set for December 2, 2024, at 9am before Justice Walker for any applications relevant to the cross-examination and the interim lender Qu Bo Liu is hereby granted short leave to file materials prior to that hearing no later than November 28, 2024;
4. The extension of the stay of proceedings granted on November 19, 2024, extending the stay of proceedings to February 21, 2025, is made without prejudice to any position taken by the creditors at further applications and hearings in these proceedings;
5. A two full-day hearing shall be scheduled prior to the expiry of the stay of proceedings, to address the CCAA proceedings generally, if any further relief is sought, and the bankruptcy application of Shougang International Trade & Engineer Corporation ("**Shougang**") (the "**Proceeding Hearing**");
6. If the Petitioner seeks further relief in the CCAA proceedings at the Proceeding Hearing, the Petitioner must file and serve its materials 8 business days in advance of the Proceeding Hearing;
7. Shougang is granted leave to reset its bankruptcy application for either: (i) the same date as the Proceeding Hearing; or (ii) if no application is brought by the Petitioner for the Proceeding Hearing, then whichever date is provided for by the Court in a subsequent hearing;
8. The transcripts of the hearings held on August 30, September 17, October 9, 17, 18, 21, and 22, 2024, are to be released to the parties of this action; and


- 9. 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 D. Bradshaw)

BY THE COURT



REGISTRAR



SCHEDULE "A"

NAME OF COUNSEL	PARTY REPRESENTING
Eamonn Watson	Shougang International Trade & Engineer Corporation
Mia Laity	Monitor, FTI Consulting Canada Inc.
Erin Hatch	Canada Zhonghe Investment Ltd.
Barry Fraser, Helen Liu	Qu Bo Liu
Ashley Bowron, Kevan Hanowski	TaneMahuta Capital Ltd.

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.

PETITIONERS

ORDER MADE AFTER APPLICATION

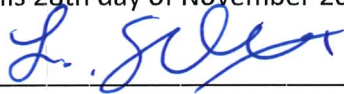
DLA Piper (Canada) LLP
Barristers & Solicitors
Suite 2700, The Stack
1133 Melville St
Vancouver, BC V6E 4E5

Tel. No. 604.687.9444
Fax No. 604.687.1612

File No.: 080762-00014

JDB/day

This is Exhibit "D" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia



T 604.343.3100 / F 604.343.3119 / www.fraserlitigation.com
1100 – 570 Granville Street, Vancouver, B.C. V6C 3P1

R. Barry Fraser, Managing Partner
T 604.343.3101 / bfraser@fraserlitigation.com

November 22, 2024

BY EMAIL

McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, BC V6E 0C5

Attention: Michael Feder, K.C., Lance Williams, Kevan Hanowski, Ashley Bowron

Dear Sirs and Madams:

Re: TaneMahuta Capital, Ltd. ("TaneMahuta")

We write further to the discussions with Mr. Hanowski and Ms. Bowron at a break in the hearing and at the conclusion of the hearing on November 19, 2024. We were asked to advise what allegations of unfairness and misconduct alleged on the part of Mrs. Liu, Canadian Dehua International Mines Group Inc. ("CDI"), its counsel, the Monitor, and its counsel, would need to be withdrawn in exchange for TaneMahuta not filing the second affidavit of Mr. Amanat and the order for Mr. Amanat's cross-examination being vacated.

Ms. Fellowes, K.C., in her submissions, and TaneMahuta in its notice of application, made numerous claims of misconduct and unfair treatment, including the following:

- (a) Prior to September 6, 2024, TaneMahuta was treated unfairly by reason that:
- (i) TaneMahuta was encouraged to make an offer for the Assets by CDI and the Monitor, but when it did so, CDI refused to engage in the negotiation of a binding agreement for the Wapiti and Bullmoose assets;
 - (ii) CDI gave preferential treatment to Mrs. Liu, as its counsel, DLA Piper (Canada) LLP, took instructions from Mrs. Liu, which was a conflict of interest on the part of Mr. Bradshaw and his team;
 - (iii) TaneMahuta was encouraged to make a stalking horse bid by CDI and the Monitor, but when it did so, it was again treated unfairly as CDI refused to engage in the negotiation of a binding agreement;

- (iv) CDI had told TaneMahuta back in August, 2024, that it could not be the stalking horse bidder because Mrs. Liu wanted to make a stalking horse bid, but never did so, which was yet another example of unfair treatment of TaneMahuta;
 - (v) TaneMahuta was also treated unfairly as it was denied information which was known to Mrs. Liu; and
 - (vi) when the court ordered bids to be submitted by September 6, 2024, TaneMahuta was not treated fairly by CDI as it was not given a copy of the purchase agreement it had negotiated with Mrs. Liu.
- (b) Following the submission bids on September 6, 2024, it was claimed that TaneMahuta had suffered unfair treatment by reason that:
- (i) TaneMahuta made due diligence requests of CDI, but the responses were delayed, or incomplete;
 - (ii) TaneMahuta was not given the information required to be in the same position of Mrs. Liu who was a true insider;
 - (iii) both CDI and the Monitor had represented to Ms. Fellowes that TaneMahuta was entitled to make a further bid, which it then expended substantial time and effort to make;
 - (i) TaneMahuta was given inaccurate information in the Teasers prepared by the Monitor, in particular, that there were 17 Wapiti licences when there were only 5 licences;
 - (ii) 110,000 coal samples had been sent to China which was yet another example of a disparity of information between TaneMahuta and Mrs. Liu;
 - (iii) the CCAA Petition failed to disclose that none of the Wapiti licences were owned by CDI at the time of filing of the Petition, which was misconduct on the part of all of Mrs. Liu, her husband Naishun Liu, Mr. Bradshaw and his team, and the Monitor;
 - (iv) Mrs. Liu had engaged in fraudulent conduct, as well as a breach of the *Bankruptcy and Insolvency Act*, in transferring the 17 Wapiti licences to her son's company, Pioneer Exploration Corporation ("**Pioneer**"), which then allowed 8 of them to lapse;
 - (v) the 8 lapsed licences were acquired by a company called 1010 Mines Corporation, which could be a related party as the director of this company had the last name Liu;
 - (vi) Pioneer sold the 9 remaining Wapiti licences back to CDI for \$100,000, a transaction which had the hallmarks of a fraudulent transfer;
 - (vii) Mrs. Liu then allowed 4 of the remaining 9 mineral titles to lapse, and Pioneer applied to acquire them, another example of wrongful conduct by Mrs. Liu and her family; and

- (viii) CDI was not responding to TaneMahuta's request for comments on its proposed asset purchase agreement in a timely manner.

The above is not intended to be a comprehensive list of the aspersions cast by Ms. Fellowes and TaneMahuta and are set out for illustrative purposes only. Ms. Fellowes also made submissions regarding the ownership of TaneMahuta and its independence from any creditors of CDI, as well as the source of funding of TaneMahuta and its motivation in acquiring the Assets.

We have not received instructions to agree to waive our client's right to cross-examine Mr. Amanat even if TaneMahuta decides to not to file his affidavit. However, she requires, at a minimum, the withdrawal of all allegations of unfair treatment, bad faith, dishonest and fraudulent conduct, conflict of interest on the part of Mrs. Liu, CDI, its lawyers, the Monitor, and its lawyers, and the claim that TaneMahuta is entitled to make a further bid by reason of representations made to it by Mr. Bradshaw, Ms. Laity or the Monitor.

Yours truly,

Fraser / Batkin / Tribe LLP

Per 

R. Barry Fraser

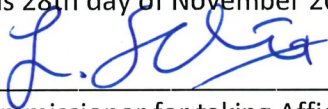
* Incorporated Partner

RBF/tj

60913-001

cc Mr. Jeffrey Bradshaw; Ms. Mia Laity

This is Exhibit "E" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024

A handwritten signature in blue ink, appearing to be "J. Silva", written over a horizontal line.

A Commissioner for taking Affidavits
within the Province of British Columbia



T 604.343.3100 / F 604.343.3119 / www.fraserlitigation.com
1100 – 570 Granville Street, Vancouver, B.C. V6C 3P1

R. Barry Fraser, Managing Partner
T 604.343.3101 / bfraser@fraserlitigation.com

November 22, 2024

BY EMAIL

McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, BC V6E 0C5

Attention: Michael Feder, K.C., Lance Williams, Kevan Hanowski, Ashley Bowron

Dear Sirs and Madams:

Re: TaneMahuta Capital, Ltd. ("TaneMahuta")

We write further to the hearing before Justice Walker on November 19, 2024 and our efforts to review the central securities register (the "CSR") of your client TaneMahuta and other documents available for public inspection, which we had previously requested through Ms. Fellowes, K.C.

At the hearing, Mr. Hanowski advised us that the registered and records office had been changed to suite 100 – 1515 West 7th Avenue, Vancouver, B.C. (the "R&R Office"). Following the hearing, my associate Helen Liu and I attended the R&R Office to inspect the CSR and other public documents. We were informed by a man who identified himself as Mike, that we needed to arrange for an appointment with Mr. Amanat to inspect the records.

Please advise us of a time when we may re-attend at the R&R Office to inspect the CSR and other public documents.

Yours truly,

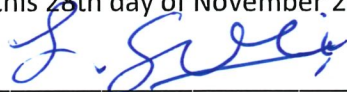
Fraser / Batkin / Tribe LLP

Per: 

R. Barry Fraser
* Incorporated Partner

RBF/hl
60913-001
cc Mr. Jeffrey Bradshaw

This is Exhibit "F" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia



T 604.343.3100 / F 604.343.3119 / www.fraserlitigation.com
1100 – 570 Granville Street, Vancouver, B.C. V6C 3P1

R. Barry Fraser, Managing Partner
T 604.343.3101 / bfraser@fraserlitigation.com

November 25, 2024

BY EMAIL

McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver, BC V6E 0C5

Attention: Michael Feder, K.C., Lance Williams, Kevan Hanowski, Ashley Bowron

Dear Sirs and Madams:

Re: TaneMahuta Capital, Ltd. ("TaneMahuta")

We write further to our letter of November 8, 2024, to Karen Fellowes, K.C., and our request for production of financial documents by TaneMahuta.

TaneMahuta's position with respect to its financial circumstances has changed dramatically since its first letter to the Monitor in July, 2024. At that time, it advised the Monitor it could only offer \$400,000, and was only interested in the Wapiti and Bullmoose mineral titles to save them from development. In his letter to the Monitor dated August 26, 2024, where Mr. Amanat claimed:

... Our stalking horse bid of \$400,000 for these assets reflects the amount we are able to pay to further the aim of environmental conservation of this area, which in turn stems from a mandate from our investors and funding sources.

On September 6, 2024, TaneMahuta delivered its bid to the Monitor, along with a cheque for the purchase price of \$650,000.

In her submissions in the support of TaneMahuta's notice of application filed on October 15, 2024, to make a revised offer, Ms. Fellowes advised the court that TaneMahuta was able to revise its offer to \$2 million as it had recently obtained information about the amount of coal contained in the Wapiti and Bullmoose titles as well as other valuable equipment and amounts spent on construction. She did not explain how this information was consistent with TaneMahuta being interested in acquiring the Wapiti and Bullmoose assets for conservation. Naturally, this inconsistency led to the submission for our client that TaneMahuta's true purpose and its funding sources were highly in doubt. TaneMahuta attempted to answer these issues by Mr. Amanat's second affidavit in which he said the source of TaneMahuta's

funds was not connected to CDI's creditors overseas. However, Mr. Amanat did not describe the source of the funds, nor provide records showing the source of the funds.


As the truthfulness of Mr. Amanat will be a material factor in determining whether TaneMahuta has been acting in good faith in these proceedings, and it will be an issue canvassed on his cross-examination, we ask that your client provide us as quickly as possible with the records which will show the true source of TaneMahuta's funds.

We also note that you have yet to provide us with a time when we may inspect the CSR and other publicly available records of TaneMahuta. Please do so without further delay.

Yours truly,

Fraser / Batkin / Tribe LLP

Per:



R. Barry Fraser

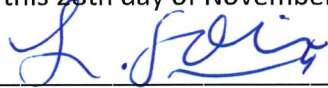
* Incorporated Partner

RBF/tj

60913-001

cc Mr. Jeffrey Bradshaw

This is Exhibit "G" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia

Elyssa Boongaling

From: Aref Amanat <aref@amanat.net>
Sent: Tuesday, November 26, 2024 10:29 AM
To: Bradshaw, Jeffrey; Yang, Dannis; Brousson, Colin; Schultz, Jordan; eamonn.watson@dentons.com; Xiao (Helen) Liu; Arenas, Avic; Denton, Chelsea; ehatch@harpergrey.com; rwu@harpergrey.com; kjackson@fasken.com; wroberts@lawsonlundell.com; rlaity@blg.com; jpepper@blg.com; weiheng@weihenglaw.com; Daniel Shouldice; fmcdonnell@fasken.com; jfipke@fasken.com; R. Barry Fraser; rhe@thclawyers.ca; Aminollah Sabzevari; Julio.Paoletti@justice.gc.ca; Khanh.Gonzalez@justice.gc.ca
Subject: In the Matter of Canadian Dehua International Mines Group Inc., No. S-224444 Vancouver Registry
Attachments: Notice of Intention to Act in Person (TaneMahuta Capital Ltd.).pdf

To the Service List,

Please see the attached Notice of Intention to Act in Person.

Aref H. Amanat*

Suite 100, 1515 West 7th Avenue

Vancouver, BC

V6J 1S1 CANADA

+1 604 442 0898

aref@amanat.net

www.amanat.net

*Law Corporation. This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged and confidential. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone (+1 604 442 0898) and delete it.

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

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IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF
CANADIAN DEHUA INTERNATIONAL MINES GROUP INC., WAPITI COKING COAL
MINES CORPORATION AND CANADIAN BULLMOOSE MINES CO., LTD.

PETITIONERS

NOTICE OF INTENTION TO ACT IN PERSON

TAKE NOTICE that TaneMahuta Capital Ltd. now intends to act personally in this proceeding in place of Michael Feder, K.C., Lance Williams, Kevan Hanowski and Ashley Bowron of McCarthy Tétrault LLP.

DATE: November 25, 2024



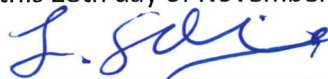
Aref Amanat

TaneMahuta Capital Ltd.
Per: Aref Amanat
Title: President

Address for service:

Registered Office
Suite 100 – 1515 West 7th Avenue
Vancouver, BC V6J 1S1

This is Exhibit "H" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia

Elyssa Boongaling

From: Xiao (Helen) Liu
Sent: Tuesday, November 26, 2024 2:26 PM
To: Aref Amanat
Cc: R. Barry Fraser; Bradshaw, Jeffrey; Yang, Dannis; Tessa Jamieson
Subject: In the Matter of Canadian Dehua International Mines Group Inc., No. S-224444
Vancouver Registry
Attachments: 2024.11.22 LT Michael Feder K.C. re TaneMahuta (00677799xD8D8E).PDF; 2024.11.22 -
LT McCarthy re TaneMahuta (00677942xD8D8E).PDF; 2024.11.25 LT McCarthy re
document production (00678271xD8D8E).PDF

Hi Mr. Amanat,

We acknowledge the receipt of the Notice of Intention to Act in Person.

Our office has recently sent the attached letters to your former counsel at McCarthy Tétrault LLP and we have not yet received a response. We request that you provide us with a time when we may inspect the CSR and other publicly available records of TaneMahuta without further delay.

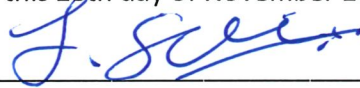
Regards,
Helen

Xiao (Helen) Liu / Fraser Litigation Group
Associate
T 604.343.3121 / F 604.343.3119
1100 - 570 Granville Street, Vancouver, BC V6C 3P1
www.fraserlitigation.com / [Profile](#)

FRASER / BATKIN / TRIBE LLP

NOTICE: This email from Fraser Litigation Group (Fraser Batkin Tribe LLP), and any attachments to it, contains information that is confidential to the intended recipient(s) and you must not review, copy, disseminate, disclose to others, or take any action in reliance on this email. If you have received this email in error, please advise Fraser Litigation Group system.

This is Exhibit "I" referred to in the 3rd
Affidavit of Xiao Liu sworn
before me at Vancouver, British Columbia
this 28th day of November 2024



A Commissioner for taking Affidavits
within the Province of British Columbia

November 27, 2024

Fraser Batkin Tribe LLP
1100 – 570 Granville Street
Vancouver, BC V6C 3P1
Attention: R. Barry Fraser

VIA EMAIL

Mr. Fraser:

I write in response to the email from Ms. Helen Liu dated yesterday. TaneMahuta Capital Ltd. (“**TaneMahuta**”) is no longer participating in the insolvency proceedings of Canadian Dehua International Mines Group Inc. (“**CDI**”). In accordance with a letter dated yesterday from me to the Monitor and CDI, which I have enclosed herewith, TaneMahuta has withdrawn its bid as well as its related submissions and affidavits.

Should the publicly available corporate records of TaneMahuta continue to be of interest you, they can be made available for inspection at our office during regular business hours this week in accordance with the requirements of the *Business Corporations Act* (the “*Act*”). Please note that Section 49 of the *Act* lays out the specific circumstances under which which the shareholder list can be disclosed:

49 (1) A person may apply to a company, or to the person who has custody or control of its central securities register, for a list setting out the following:

- (a) The names and last known addresses of the shareholders;*
- (b) The number of shares of each class or series of shares held by each of those shareholders.*

(2) An application under subsection (1) must be in writing and must include

- (a) an affidavit of the person seeking the list*
 - (i) stating the name and mailing address of the applicant or, if the applicant is a corporation, its name and mailing address, and if different, the delivery address, of its registered office or equivalent, and*
 - (ii) stating that the list will not be used except as permitted under subsection (3), and*
- (b) payment of the fee charged under subsection (7).*

(3) A person must not use a list obtained under this section except in connection with an effort to

- (a) influence the voting of shareholders of the company at any meeting of shareholders,
- (b) acquire or sell securities of the company,
- (c) effect an amalgamation or a similar process involving the company or a reorganization of the company,
- (d) call a meeting under section 167 (8) or 322 (4), or
- (e) identify the shareholders of an unlimited liability company.

Given that you have not met the requirements of Section 49, the shareholder list will not be made available to you. Should you nevertheless decide to inspect the other records, please provide at least two hours' advance notice by email to myself and my assistant at admin@amanat.net to ensure someone is here to receive you.

Very truly yours,

TaneMahuta Capital Ltd.



AMANAT

By: _____

Name: Aref Amanat

Title: President

cc:

Craig Munro, FTI Consulting Canada Inc.

David Gruber, Bennett Jones LLP

Mia Laity, Bennett Jones, LLP

Colin Brousson, DLA Piper (Canada) LLP

Jeffrey Bradshaw, DLA Piper (Canada) LLP

Holly Yuen, DLA Piper (Canada) LLP

November 26, 2024

FTI Consulting Canada Inc.
700 West Georgia Street
Vancouver, BC V7Y 1C7
Attention: Craig Munro

Bennett Jones LLP
Suite 2500, Park Place
666 Burrard Street
Vancouver, BC V6C 2Z7
Attention: David Gruber and Mia Laity

DLA Piper (Canada) LLP
Suite 2800, Park Place
666 Burrard Street
Vancouver, BC V6C 2Z7
Attention: Collin Brousseau and Jeffrey Bradshaw

VIA EMAIL

Dear Sirs/Mesdames:

RE: *Proceedings under the Companies' Creditors Arrangement Act for Canadian Dehua International Mines Group Inc. (the "CCAA Proceedings")*

TaneMahuta Capital Ltd. ("**TaneMahuta**") is withdrawing its offer set out in a purchase agreement submitted to FTI Consulting Canada Inc. (the "**Monitor**") on October 15, 2024 and attached to the Nineteenth Report of the Monitor, dated October 17, 2024 as Appendix A (the "**Offer**"). As Court approval of the Offer was not obtained in October 2024 as required, the Offer is withdrawn in accordance with its terms.

TaneMahuta also withdraws all filed and unfiled application materials, evidence and submissions made by TaneMahuta and its counsel in connection with the CCAA Proceedings. TaneMahuta does not intend to participate further in the CCAA Proceedings.

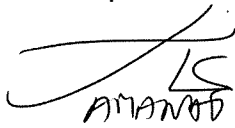
TaneMahuta authorizes the Monitor to deal with the deposit of \$650,000 held on TaneMahuta's behalf in accordance with the directions of West Moberly First Nations.

We trust this resolves all outstanding issues between TaneMahuta and the parties to the CCAA Proceedings, including any issues regarding a cross-examination of Mr. Amanat and access to TaneMahuta's central securities register.

Enclosed is a Notice of Intention to Act in Person, which we will circulate to the Service List shortly after delivery of this letter.

Very truly yours,

TaneMahuta Capital Ltd.

A handwritten signature in black ink, appearing to read 'Aref Amanat', with a stylized flourish above the name.

By: _____

Name: Aref Amanat

Title: President

Enclosure Notice of Intention to Act in Person