



This is the 1st affidavit
of Channie Yoon in this case
and was made on April 17, 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., WAPITI COKING COAL MINES CORP.
and CANADIAN BULLMOOSE MINES CO., LTD.

PETITIONER

AFFIDAVIT
FORM 109 (RULE 22-2(2) AND (7))

I, Channie Yoon, legal administrative assistant, of 3200 - 650 West Georgia Street, in the City of Vancouver, Province of British Columbia, AFFIRM AND SAY AS FOLLOWS:

1. I am a legal administrative assistant with Harper Grey LLP, solicitors for the Canada Zhonghe Investment Ltd., and as such I have personal knowledge of the matters and facts herein deposed to save and except where the same are stated to be made upon information and belief and as to the latter I verily believe them to be true.
2. Attached hereto and marked as **Exhibit "A"** to this my affidavit is a true copy of the email from counsel for Canada Zhonghe Investment Ltd. to counsel the Monitor, dated May 4, 2023.

3. Attached hereto and marked as **Exhibit "B"** to this my affidavit is a true copy of the emails from counsel for China Shougang International Trade & Engineering Corporation and counsel for Canada Zhonghe Investment Ltd. to counsel for Canadian Dehua International Mines Group Inc., dated April 9, 2025 and April 15, 2025.

AFFIRMED BEFORE ME at Vancouver,
in British Columbia, on April 17, 2025



A Commissioner for taking affidavits within
British Columbia

Erin M. Hatch
Barrister and Solicitor

(Print name or affix stamp of commissioner)

3200 Vancouver Centre
650 West Georgia Street
Vancouver, BC V6B 4P7



CHANNIE YOON

Channie Yoon

From: Erin Hatch
Sent: Thursday, May 4, 2023 3:54 PM
To: 'Munro, Craig'; 'Hailey.Liu@fticonsulting.com'
Cc: Chenyang Li
Subject: RE: Dehua International Mines Group Inc. - amendment to Proof of Claim of Canada Zhonghe Investment Ltd.
Attachments: Proof of Claim of Canada Zhonghe Investment Ltd..PDF; \$14,343.72 cheque to bailiff.pdf

Hi Craig and Hailey,

As you may recall, I am legal counsel for Canada Zhonghe Investment Ltd. I delivered the attached proof of claim but did not receive any further communications from the monitor.

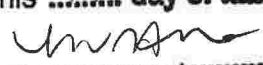
I'm emailing to amend the attached proof of claim to add the amount of \$14,343.72 to the total amount claimed by my client, therefore, increasing my client's unsecured claim to \$5,392,257.21.

The additional \$14,343.72 arises out of an additional disbursement that had been omitted from the default judgment bill of costs because the bailiff, Accurate Court Bailiff Services Ltd., had not pursued their fees for the enforcement steps they took on behalf of my client prior to the CCAA proceeding. The bailiff's fees have now been paid by my client, as evidenced by the attached cheque.

Please confirm whether you require my client to re-submit its proof of claim with this additional amount or whether this email is sufficient to amend the claim.

Regards,

Erin Hatch
Lawyer | Harper Grey LLP
T 604.895.2818 | F 604.669.9385
[Website](#) | [Unsubscribe](#) | ehatch@harpergrey.com

This is Exhibit "A" referred to in the
affidavit of Channie Yoon
sworn before me at Vancouver BC
this 17 day of April, 2023

A Commissioner for taking Affidavits
within British Columbia

From: Erin Hatch
Sent: Wednesday, August 10, 2022 5:30 PM
To: Munro, Craig ; Hailey.Liu@fticonsulting.com
Cc: Kaye Wong
Subject: RE: Dehua International Mines Group Inc. - Proof of Claim of Canada Zhonghe Investment Ltd.

Hi Craig and Hailey,

Please find attached.

Regards,

Erin Hatch
Barrister & Solicitor | Harper Grey LLP
T 604.895.2818 | F 604.669.9385
[Website](#) | [Unsubscribe](#) | ehatch@harpergrey.com

**IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF CANADIAN
DEHUA INTERNATIONAL MINES GROUP INC. ("CDI")**

PROOF OF CLAIM

ALL CAPITALIZED TERMS NOT OTHERWISE DEFINED HEREIN HAVE THE MEANINGS GIVEN TO THEM IN THE ENCLOSED CLAIMS PROCESS INSTRUCTION LETTER, INCLUDING APPENDIX "A" THERETO.

Please read the enclosed Claims Process Instruction Letter carefully prior to completing this Proof of Claim.

Please review the Claims Process Order, which is posted to the Monitor's Website at:
<http://cfcanada.fticonsulting.com/CanadianDehuaInternational/>

1. Particulars of Claim

Please complete the following (the name and contact information should be of the original Creditor, regardless of whether all or any portion of the Claim has been assigned).

Full Legal Name:	Canada Zhonghe Investment Ltd.
Full Mailing Address:	c/o Harper Grey LLP Attn: Erin Hatch 3200-650 West Georgia Street, Vancouver, BC V6B 4P7
Telephone Number:	604-687-0411
Facsimile Number:	n/a
E-mail address:	ehatch@harpergrey.com
Attention (Contact Person):	Counsel for Canada Zhonghe Investment Ltd.: Erin Hatch

Has all or part of the Claim been assigned by the Creditor to another party?

Yes: ☐

No: ☒

2. Particulars of Assignee(s) (If any)

Please complete the following if all or a portion of the Claim has been assigned. Insert full legal name of the assignee(s) of the Claim. If there is more than one assignee, please attach a separate sheet with the required information.

Full Legal Name of Assignee:	n/a
Full Mailing Address of Assignee:	n/a
Telephone Number of Assignee:	n/a
Facsimile Number of Assignee:	n/a
E-mail address of Assignee:	n/a
Attention (Contact Person):	n/a

3. Proof of Claim

I, Failang Wang (name), of Vancouver, British Columbia
(City and Province, State or Territory) do hereby certify that:

- ☐ I am a Creditor; or
- ☒ I am the director (state position or title) of Canada Zhonghe Investment Ltd. (name of corporate Creditor), which is a Creditor;
- I have knowledge of all the circumstances connected with the Claim referred to below;
- I (or the corporate Creditor, as applicable) have a Claim against CDI as follows:

PRE-FILING CLAIM (as at June 3, 2022):

\$_____ (insert amount of Claim)

Note: Claims should be submitted in Canadian Dollars converted using the applicable Bank of Canada exchange rate published on the Filing Date.

4. Nature of Claim

(Check and complete appropriate category)

[☒] A. UNSECURED CLAIM OF \$ 5,377,913.48. That in respect of this debt, no assets CDI are pledged or held as security.

[☐] B. SECURED CLAIM OF \$ _____ That in respect of this debt, assets CDI valued at \$ _____ are pledged to or held by me as security, particulars of which are as follows:

The claim is comprised of the following: default judgment in the amount of \$5,277,256.51, costs in the amount of \$2,536.15 and post-judgment interest in the amount of \$98,120.82.

(Give full particulars of the security, including the date on which the security was obtained, and attach a copy of any security documents.)

5. Particulars of Claims

Please attach details concerning the particulars of the Creditor's Claims, as well as any security held by the Creditor. Please find enclosed a copy of the default judgment, bill of costs and post judgment interest calculations.

(Provide all particulars of the Claims and supporting documentation, including the amount, description of transaction(s) or agreement(s) giving rise to the Claims, name of any guarantor which has guaranteed the Claims, amounts of invoices, particulars of all credits, discounts, etc. claimed, description of the security, if any, granted by CDI to the Creditor or asserted by the Creditor and estimated value of such security.

6. Filing of Claims

This Proof of Claim must be received by the Monitor by no later than 5:00 p.m. (Vancouver time) on August 15, 2022 (the "Claims Bar Date").

IN ACCORDANCE WITH THE TERMS OF THE CLAIMS PROCESS ORDER, THE FAILURE TO FILE YOUR PROOF OF CLAIM BY THE CLAIMS BAR DATE, WILL RESULT IN YOUR CLAIM BEING FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A CLAIM AGAINST CDI.

This Proof of Claim must be delivered by prepaid registered mail, personal delivery, e-mail, or courier to the following addresses:

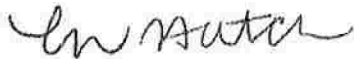
FTI Consulting Canada Inc.
701 West Georgia Street
Suite 1450, PO Box 10089
Vancouver, BC V7Y 1B6

Attention: Craig Munro and Hailey Liu

Telephone: 1.604.757.6108
1.403.454.6040

Email: Craig.Munro@fticonsulting.com
Hailey.Liu@fticonsulting.com

DATED this 10 day of August, 2022



Witness Signature

ERIN HATCH

Print Name of Witness

Erin M. Hatch
Barrister and Solicitor
Harper Grey LLP
3200 Vancouver Centre
650 West Georgia Street
Vancouver, BC V6B 4P7



Signature of Creditor

Canada Zhonghe Investment Ltd.

Print Name of Creditor

*If the Creditor is other than an individual,
print name and title of authorized
signatory*

Failang Wang

Name

Director

Title

SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY

AUG 30 2021

ENTERED



IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

CANADA ZHONGHE INVESTMENT LTD.

PLAINTIFF

AND:

CANADIAN DEHUA INTERNATIONAL MINES GROUP INC.

DEFENDANT

DEFAULT JUDGMENT

FORM 8 (RULE 3-8(2), (3), (5), AND (6))
[AM BC REG. 58/2012, SCH. A, S. 3]

BEFORE A REGISTRAR

The plaintiff, Canada Zhonghe Investment Ltd., having filed and served a notice of civil claim, and the defendant, Canadian Dehua International Mines Group Inc., having failed to file and serve a response to civil claim within the time allowed;

THIS COURT ORDERS that the defendant, Canadian Dehua International Mines Group Inc. pay to the plaintiff, Canada Zhonghe Investment Ltd.:

1. the sum of \$4,781,310.20;

\$ 4, 781, 310.20
2. interest as claimed in the amount of \$495,946.31 (on the principal of ~~\$4,781,310.20~~ at the rate of 6% per annum from and including September 24, 2019 to June 17, 2021);
3. costs to be assessed.

Date: August 30 2021

Interest calculations (see attached)

Registrar

150851 Canada Zhonghe Investment Ltd.		Date: 6/17/2021
Principal: \$4,781,310.20		

Start Date	End Date	Rate	Days	Total Interest	Total
9/23/2019	1/1/2020	6.0000%	99	\$72,810.91	\$4,854,121.11
1/1/2020	1/1/2021	6.0000%	366	\$286,878.61	\$5,145,999.72
1/1/2021	6/17/2021	6.0000%	167	\$131,256.79	\$5,277,256.51

Days	632
Total Interest	\$495,946.31
Total	\$5,277,256.51
Daily Interest starting 17 June 2021	\$785.97
Interest between 2 Dates	Simple Interest
Compounding Period	NA
Day count	Actual/Actual
Year base	Civil Year

No. S-214547
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

CANADA ZHONGHE INVESTMENT LTD.

PLAINTIFF

AND:

CANADIAN DEHUA INTERNATIONAL MINES GROUP INC.

DEFENDANT

DEFAULT JUDGMENT BILL OF COSTS

FORM 63 (RULE 14-1(20))

This is the default judgment bill of costs of: Canada Zhonghe Investment Ltd.

Amount involved: \$5,277,256.51

Item	Description	Units	
		Claimed	Allowed
	To enter judgment under Rule 3-8	\$680.00	
	Sub-total:	\$ 680.00	
	Plus Tax imposed under the <i>Social Service Tax Act</i> (7%)	47.60	
	Plus Tax imposed under Part IX [<i>Goods and Service Tax</i>] of the <i>Excise Tax Act</i> (Canada) (5%)	34.00	
Total:		<u>\$ 761.60</u>	<u>\$</u>
Taxable Disbursements:		Claimed:	Allowed:
	Photocopies 1,143.00 (\$0.25 per page)	\$ 285.75	
	Postage	\$ 10.67	
	Delivery	\$ 35.54	

Case Law – Westlaw	\$	676.00	
BCOnline/LTSA Charge	\$	12.17	
Scanning/PDF	\$	4.61	
Process Service <i>Action Process Serving Ltd – May 25, 2021</i>	\$	90.20	
CSO Searches	\$	24.00	
Subtotal Taxable Disbursements:	\$	1,138.94	\$ _____
Plus Tax imposed under the <i>Social Service Tax Act</i> (7%)	\$	79.73	
Plus Tax imposed under Part IX [<i>Goods and Service Tax</i>] of the <i>Excise Tax Act</i> (Canada) (5%)	\$	<u>56.95</u>	_____
Subtotal Taxable Disbursements Including Tax:	\$	<u>1,275.62</u>	\$ _____
Non-Taxable Disbursements:		Claimed:	Allowed:
Registry Fees - <i>Filing of Notice of Civil Claim</i> - <i>Filing of requisition in search for Response to Civil Claim, with supporting Affidavit #1 of Erin Hatch and Affidavit of Personal Service of Carrie-Lee Godfrey</i> - <i>Filing of Default Judgment</i>	\$	360	_____
LTO Search	\$	9.93	
Company Search	\$	85.00	
PPR Search	\$	34.00	
Other Filing Fee	\$	10.00	
Subtotal Non-Taxable Disbursements:	\$	<u>498.93</u>	\$ _____
Total Disbursements & Tax:	\$	<u>1,774.55</u>	\$ _____
Total Costs, Disbursements & Taxes:	\$	<u>2,536.15</u>	_____

TOTAL ALLOWED:

\$ _____

Date: _____

Signature of assessing officer

150551		Date:	7/14/2022
Canadian Dehus International Mines Group			
Principal: \$5,277,256.51			

	Start Date	End Date	Rate	Days	Total Interest	Total
1	8/30/2021	1/1/2022	2.4500%	124	\$43,924.12	\$5,321,180.63
2	1/1/2022	6/3/2022	2.4500%	153	\$54,196.70	\$5,375,377.33

Days	277
Total Interest	\$98,120.82
Total	\$5,375,377.33
Daily Interest starting 3 June 2022	\$360.81
Interest between 2 Dates	Simple Interest Capitalized
Compounding Period	Annually
Rate Table	BC-Post-Judgment
Percentage to Add	0.0000 %
Day count	Actual/Actual
Year base	Civil Year

CANADA ZHONGHE INVESTMENT LTD

3800 WESBROOK MALL
VANCOUVER, BC V6S 2L9
Tel: (604) 697-9212

001501

DATE 2 0 2 3 - 0 4 - 1 0
Y Y Y Y M M D D

PAY to Accurate Court Bailiff Services Ltd.
the order of

\$ 14,343.72

Fourteen Thousand Three Hundred Forty Three -

72 DOLLARS 

 BANK OF CHINA (CANADA)
1025 DUNSMUIR STREET, P.O. BOX 49277
VANCOUVER, B.C. V7X 1L3

CANADA ZHONGHE INVESTMENT LTD

RE Inv# 4-1613

PER



⑆001501⑆ ⑆00030⑆ ⑆08⑆30020058363⑆

Channie Yoon

From: Watson, Eamonn <eamonn.watson@dentons.com>
Sent: Tuesday, April 15, 2025 11:26 AM
To: Hunter, Carole; Bradshaw, Jeffrey
Cc: Channie Yoon; Erin Hatch; colin.brousson@dlapiper.com; dannis.yang@dlapiper.com; Craig.Munro@fticonsulting.com; Hailey.Liu@fticonsulting.com; gruberd@bennettjones.com; laitym@bennettjones.com; morenoe@bennettjones.com; Schultz, Jordan; Arenas, Avic; Denton, Chelsea; Roselle Wu; kjackson@fasken.com; mtomos@fasken.com; wroberts@lawsonlundell.com; RLaity@blg.com; JPepper@blg.com; weiheng@weihenglaw.com; Daniel.Shouldice@mcmillan.ca; fmcconnell@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; sdawson@djacounsel.com; wamanuel@djacounsel.com
Subject: RE: In the matter of Canadian Dehua International Mines Group Inc., SCBC Action No. S-224444, Vancouver Registry

Hello Carole and Jeffrey,

I am following up on Erin's email below. It has been a further week since the deadline to file materials and we still have not seen the proposed SISP or stalking horse agreement. The procedural order of Justice Walker was intended to avoid further delay, and our client does not necessarily agree to any further delay as alluded to by the Monitor in its most recent report.

Notwithstanding the deficient service, our client will file an application response to be included in the application record. We will provide same tomorrow.

Should you have any materials to be included in the bankruptcy application record, please provide same by 12PM tomorrow.


Kind regards, Eamonn.

Eamonn F. Watson
Senior Associate

My pronouns are: He/Him/His

+1 604 629 4997

Dentons Canada LLP | Vancouver

This is Exhibit "B" referred to in the
affidavit of Channie Yoon
sworn before me at Vancouver BC
this 17 day of April 2025

A Commissioner for taking Affidavits
within British Columbia

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see dentons.com for Legal Notices.

From: Erin Hatch <ehatch@harpergrey.com>
Sent: Wednesday, April 9, 2025 11:11 AM
To: colin.brousson@dlapiper.com; jeffrey.bradshaw@dlapiper.com; dannis.yang@dlapiper.com;

Craig.Munro@fticonsulting.com; Hailey.Liu@fticonsulting.com; gruberd@bennettjones.com; laitym@bennettjones.com; morenoe@bennettjones.com; Schultz, Jordan <jordan.schultz@dentons.com>; Watson, Eamonn <eamonn.watson@dentons.com>; Arenas, Avic <avic.arenas@dentons.com>; Denton, Chelsea <chelsea.denton@dentons.com>; Erin Hatch <ehatch@harpergrey.com>; Roselle Wu <rwu@harpergrey.com>; kjackson@fasken.com; mtomos@fasken.com; wroberts@lawsonlundell.com; RLait@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; sdawson@djacounsel.com; wamanuel@djacounsel.com; Hunter, Carole <carole.hunter@ca.dlapiper.com>
Cc: Channie Yoon <cyoon@harpergrey.com>

Subject: RE: In the matter of Canadian Dehua International Mines Group Inc., SCBC Action No. S-224444, Vancouver Registry

[WARNING: EXTERNAL SENDER]

Hi Jeffrey,

As you know, the Order of Justice Walker made on February 18, 2025 required that, if CDI sought further relief in the CCAA proceeding, CDI needed file and serve its materials 8 business days in advance of the hearing (scheduled to commence on April 22, 2025). However, CDI's application does not include the SISP or stalking horse agreement relied on in its application. Both of which are obviously substantive to CDI's materials so my position is that your client has not complied with the court order. Notwithstanding the non-compliance, please advise when you intend on providing the SISP and stalking horse agreement - they are required for my client to prepare its response.

Regards,

Erin Hatch
Partner

Harper Grey LLP.

T. 604-895-2818 E. ehatch@harpergrey.com
www.harpergrey.com | [unsubscribe](#)



From: Kumar, Ashley <ashley.kumar@ca.dlapiper.com>

Sent: Tuesday, April 8, 2025 3:58 PM

To: colin.brousson@dlapiper.com; jeffrey.bradshaw@dlapiper.com; dannis.yang@dlapiper.com; Craig.Munro@fticonsulting.com; Hailey.Liu@fticonsulting.com; gruberd@bennettjones.com; laitym@bennettjones.com; morenoe@bennettjones.com; jordan.schultz@dentons.com; eamonn.watson@dentons.com; avic.arenas@dentons.com; chelsea.denton@dentons.com; Erin Hatch <ehatch@harpergrey.com>; Roselle Wu <rwu@harpergrey.com>; kjackson@fasken.com; mtomos@fasken.com; wroberts@lawsonlundell.com; RLait@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; sdawson@djacounsel.com; wamanuel@djacounsel.com

Cc: Hunter, Carole <carole.hunter@ca.dlapiper.com>

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

Service List:

Please find attached the following:

- 1) Notice of Application, filed April 8, 2025; and
- 2) Unfiled Affidavit #5 Naishun Liu, made April 8, 2025.

Application materials are returnable on April 22 and 23, 2025 at 10:00 a.m. at the Vancouver Registry.

Regards,

Ashley Kumar

Legal Administrative Assistant

T +1 604.648.3137

E ashley.kumar@dlapiper.com



DLA Piper (Canada) LLP
Suite 2700, The Stack
1133 Melville St
Vancouver, BC V6E 4E5
www.dlapiper.com

This e-mail, the information contained in it and any attachment(s) are confidential and may be solicitor-client privileged and is intended for the sole use of the intended recipient(s). If the reader of this e-mail is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this e-mail, or any of its contents and/or attachments, is strictly prohibited. If you have received this e-mail in error, please reply to the sender and destroy all copies of the e-mail. Thank you.

CONFIDENTIALITY NOTICE: This E-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the E-mail or any attachment is prohibited. If you have received this E-mail in error, please notify HARPER GREY LLP immediately by return E-mail and delete this copy from your system.