

This is the 2nd affidavit
of Channie Yoon in this case
and was made on June 2, 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 an email thread between Kibben Jackson, Jeffrey Bradshaw and Colin Brousson (and copied to counsel for Canada Zhonghe Investment Ltd., Erin Hatch, among others, dated May 20 - 21, 2025).

AFFIRMED BEFORE ME at Vancouver,
in British Columbia, on June 2, 2025



A Commissioner for taking affidavits within
British Columbia

Erin M. Hatch
Registrar and Solicitor

(Print name or affix stamp of commissioner)

600 West Georgia Street
Vancouver, BC V6B 4P7


Channie Yoon

Channie Yoon

From: Kibben Jackson <kjackson@fasken.com>
Sent: Wednesday, May 21, 2025 6:10 AM
To: Bradshaw, Jeffrey; Brousson, Colin
Cc: 'Craig.Munro@fticonsulting.com'; 'Hailey.Liu@fticonsulting.com'; 'gruberd@bennettjones.com'; 'laitym@bennettjones.com'; 'morenoe@bennettjones.com'; Schultz, Jordan; eamonn.watson@dentons.com; Erin Hatch
Subject: RE: [EXTERNAL] RE: [EXT] In the matter of the Bankruptcy of CDI Mines Group Inc., Action No. B-220142, Vancouver Registry

Hi Jeff.

Yes, in early April 2025 we discussed (for the second time) the idea of an application to determine CKD's claim (should it be disputed), but we did not discuss when that might happen, and there was no mention of June 2025. My point is that the affidavit is misleading in suggesting that there are anything like "ongoing discussions", particularly around a hearing in June 2025.

Kibben Jackson*

Partner

T +1 604 631 4786 | kjackson@fasken.com

Fasken Martineau DuMoulin LLP

*Law Corporation

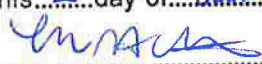
From: Bradshaw, Jeffrey <jeffrey.bradshaw@ca.dlapiper.com>

Sent: May-21-25 3:52 AM

To: Kibben Jackson <kjackson@fasken.com>; Brousson, Colin <colin.brousson@ca.dlapiper.com>

Cc: 'Craig.Munro@fticonsulting.com' <Craig.Munro@fticonsulting.com>; 'Hailey.Liu@fticonsulting.com' <Hailey.Liu@fticonsulting.com>; 'gruberd@bennettjones.com' <gruberd@bennettjones.com>; 'laitym@bennettjones.com' <laitym@bennettjones.com>; 'morenoe@bennettjones.com' <morenoe@bennettjones.com>; Schultz, Jordan <jordan.schultz@dentons.com>; eamonn.watson@dentons.com; ehatch@harpergrey.com

Subject: Re: [EXTERNAL] RE: [EXT] In the matter of the Bankruptcy of CDI Mines Group Inc., Action No. B-220142, Vancouver Registry

This is Exhibit "A" referred to in the affidavit of Channie Yoon sworn before me at Vancouver BC this 2 day of June 2025

A Commissioner for taking Affidavits for British Columbia

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Hi Kibben,

The discussions around timing were in the NOA we filed and I spoke with you about our intentions for putting the company on a shotgun clock to wrap up the CCAA (including the CKD issues) before the end of the sales process. I spoke with you about that on a brief heads up call just before we filed the application whenever we filed that CCAA next steps application. The June timing deadline is pushed way back now because of the court schedule which likely won't hear this continued CCAA versus bankruptcy application until July or August. We will of course canvas dates with you if we get instructions to take some position that requires a hearing. The company still does not have a position and may end up accepting the findings of the EY memo. We have our internal tax team looking at it for the company and

the interim lender/shareholder has, at her own expense, brought in Thorsteinsons for her own look. Expect to be back to you when we have a view.

Regards,
Jeffrey

From: Kibben Jackson <kjackson@fasken.com>
Sent: Wednesday, May 21, 2025 1:37:52 AM
To: Brousson, Colin <colin.brousson@ca.dlapiper.com>; Bradshaw, Jeffrey <jeffrey.bradshaw@ca.dlapiper.com>
Cc: 'Craig.Munro@fticonsulting.com' <Craig.Munro@fticonsulting.com>; 'Hailey.Liu@fticonsulting.com' <Hailey.Liu@fticonsulting.com>; 'gruberd@bennettjones.com' <gruberd@bennettjones.com>; 'laitym@bennettjones.com' <laitym@bennettjones.com>; 'morenoe@bennettjones.com' <morenoe@bennettjones.com>; Schultz, Jordan <jordan.schultz@dentons.com>; eamonn.watson@dentons.com <eamonn.watson@dentons.com>; ehatch@harpergrey.com <ehatch@harpergrey.com>
Subject: [EXTERNAL] RE: [EXT] In the matter of the Bankruptcy of CDI Mines Group Inc., Action No. B-220142, Vancouver Registry

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Colin/Jeff:

Just a quick note on para. 35 of Naishun Liu's affidavit. There have not been any ongoing discussions around setting a date before the end of June for an application to determine the validity and quantum of CKD's claim. Back in February 2025 Jeff discussed with me getting an application heard in March 2025 in the event that CDI did not accept my client's prior advice as to its claim. Since then I have yet to hear whether CDI disputes my client's claim, and, in any event, we have not discussed when an such application might be set *if CDI disputes CKD's claim*.

To be clear: we cannot have an application in June 2025 as my client's representative is away for an extended period as of the end of this week. But discussing dates is premature until we know that CDI disputes CKD's claim.

Sincerely,

Kibben Jackson*

Partner

T. +1 604 631 4786 | kjackson@fasken.com

Fasken Martineau DuMoulin LLP

*Law Corporation

From: Kumar, Ashley <ashley.kumar@ca.dlapiper.com>
Sent: May-20-25 3:00 PM
To: 'colin.brousson@dlapiper.com' <colin.brousson@dlapiper.com>; 'jeffrey.bradshaw@dlapiper.com' <jeffrey.bradshaw@dlapiper.com>; 'Craig.Munro@fticonsulting.com' <Craig.Munro@fticonsulting.com>; 'Hailey.Liu@fticonsulting.com' <Hailey.Liu@fticonsulting.com>; 'gruberd@bennettjones.com' <gruberd@bennettjones.com>; 'laitym@bennettjones.com' <laitym@bennettjones.com>; 'morenoe@bennettjones.com' <morenoe@bennettjones.com>; 'jordan.schultz@dentons.com' <jordan.schultz@dentons.com>; eamonn.watson@dentons.com <eamonn.watson@dentons.com>

'avic.arenas@dentons.com' <avic.arenas@dentons.com>; 'chelsea.denton@dentons.com' <chelsea.denton@dentons.com>; 'ehatch@harpergrey.com' <ehatch@harpergrey.com>; 'rwu@harpergrey.com' <rwu@harpergrey.com>; Kibben Jackson <kjackson@fasken.com>; 'wroberts@lawsonlundell.com' <wroberts@lawsonlundell.com>; 'RLaity@blg.com' <RLaity@blg.com>; 'JPepper@blg.com' <JPepper@blg.com>; 'weiheng@weihenglaw.com' <weiheng@weihenglaw.com>; 'Daniel.Shouldice@mcmillan.ca' <Daniel.Shouldice@mcmillan.ca>; Fergus McDonnell <fmcdonnell@fasken.com>; Johanna Fipke <jfipke@fasken.com>; 'bfraser@fraserlitigation.com' <bfraser@fraserlitigation.com>; 'hliu@fraserlitigation.com' <hliu@fraserlitigation.com>; 'rhe@thclawyers.ca' <rhe@thclawyers.ca>; 'Aminollah.Sabzevari@justice.gc.ca' <Aminollah.Sabzevari@justice.gc.ca>; 'Julio.Paoletti@justice.gc.ca' <Julio.Paoletti@justice.gc.ca>; 'Khanh.Gonzalez@justice.gc.ca' <Khanh.Gonzalez@justice.gc.ca>; 'rcooper@mcewanpartners.com' <rcooper@mcewanpartners.com>; 'lansari@mcewanpartners.com' <lansari@mcewanpartners.com>; 'SSchachter@nst.ca' <SSchachter@nst.ca>; 'jlockhart@nst.ca' <jlockhart@nst.ca>; 'rrabey@nst.ca' <rrabey@nst.ca>; 'mcreamore@nst.ca' <mcreamore@nst.ca>; 'sdawson@djacounsel.com' <sdawson@djacounsel.com>; 'wamanuel@djacounsel.com' <wamanuel@djacounsel.com>; Shahidian, Shahrzad <shahrzad.shahidian@ca.dlapiper.com>
Cc: Hunter, Carole <carole.hunter@ca.dlapiper.com>
Subject: [EXT] In the matter of the Bankruptcy of CDI Mines Group Inc., Action No. B-220142, Vancouver Registry

[CAUTION: This email originated from outside of Fasken. Exercise care before clicking links or opening attachments.]

Service List:

Please find attached the following:

1. Response to Application for Bankruptcy Order, filed May 16, 2025; and
2. Affidavit #1 of Naishun Liu, made May 19, 2025, unfiled.

Filed copy of the Affidavit will be circulated in due course.

Regards,

Ashley Kumar
Legal Administrative Assistant

T +1 604.648.3137
E ashley.kumar@ca.dlapiper.com



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