Action 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 COMRPOMISE 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 Justice Walker at the courthouse at 800 Smithe Street, Vancouver, BC, V6Z 2E1 on a date to be set by Notice of Hearing of Application for the order set out in Part 1 below.

The applicant estimates that the application will take 1 hour.

The applicants proposes that the matter will be heard on October 21, 2026.

☐ This matter is within the jurisdiction of an Associate Judge.

☒ 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**", 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 January 29, 2027.

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 pursuant to an order dated June 25, 2026, was extended to October 30, 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 owned the Murray River project which involved 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.

7. On March 13, 2026, CDI closed the sale of the Iron Ross Project, 100 common shares in Canada Dehua Drilling Ltd. and 80 common shares in Vancouver Island Iron Ore

Corporation (collectively, the "**Residual Assets**") to Qubo Liu, as the Interim Lender. Upon the closing of the sale transaction for the Residual Assets, the Interim Lender was repaid in full for all advances made under the Interim Financing Facility.

CKD Tax Indemnity Claim

8. CDI holds a 25% interest in Canadian Kailuan Dehua Mines Co., Ltd. ("**CKD**"). 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%).

9. After the formation of the CKD joint venture, CDI agreed to indemnity 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.

10. 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.

11. CKD provided its proof of claim to the Monitor on February 13, 2026. The Monitor requested further information from CKD to evaluate the CKD Indemnity Claim but such information has not been provided. The deadline for the Monitor and CKD to attempt to find a consensual resolution to the CKD Indemnity Claim was June 15, 2026.

12. CKD was supposed to file an application seeking to resolve the CKD Indemnity Claim if a consensual resolution was not achieved by June 15, 2026, however, CKD advised the Monitor that it required until at least September 30, 2026 to attempt a consensual resolution.

13. On June 25, 2026, this Honourable Court granted an Order requiring CKD to file an application for a declaration with respect to the validity and quantum of the CKD Indemnity Claims against CDI by no later than September 25, 2026 (the "**Claims Bar Date**") if a consensual resolution to the claim was not reached by September 15, 2026.

14. CKD filed its notice of application on September 25, 2026. The hearing of the application was to take place on October 20, 2026. CDI filed an application response on October 8, 2026 which requested additional time for response materials and examinations before the hearing of the application. Qu Bo Liu, a shareholder of CDI filed an application response on October 13, 2026 supporting CDI's application response and certain additional relief.

15. CDI's interest in CKD is the only remaining asset of CKD. The validity of the CKD Indemnity Claim must be finally determined in order to conclude these proceedings. The extension of the Stay of Proceedings to January 29, 2027 is necessary to deal with certain procedural issues raised in the application responses of CDI and Qu Bo Liu and to seek a final determination of the CKD Indemnity Claim.

Part 3: LEGAL BASIS

3. 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.

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 January 30, 2027, or any alternative date which the Court sees fit.

Part 4: MATERIAL TO BE RELIED ON

1. Notice of Application of Canadian Kailuan Dehua Mines Co., Ltd. filed September 25, 2026;

2. Application Response of Canadian Dehua International Mines Group Inc. filed October 8, 2026;

3. Application Response of Qu Bo Liu filed October 13, 2026; and

4. 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 21 days after service of this notice of application, serve the following on the applicant and on every other party of record:

(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).

October 21, 2026
Date

Signature of ☑ lawyer for the applicant
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

Schedule "A"

(Service List)

No. S224444
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

Service List

(Last Updated: June 29, 2026)

DLA Piper (Canada) LLP #2800 – 666 Burrard Street Vancouver, BC V6C 2Z7 **Attention: Colin D. Brousson** **Jeffrey D. Bradshaw** Email: colin.brousson@dlapiper.com jeffrey.bradshaw@dlapiper.com Telephone: 604.643.6400 604.643.2941 *Counsel for the Petitioner, Canadian Dehua International Mines Group Inc.*	FTI Consulting Canada Inc. Suite 1450, P.O. Box 10089 701 West Georgia St. Vancouver, BC V7Y 1B6 **Attention: Craig Munro** **Hailey Liu** Email: Craig.Munro@fticonsulting.com Hailey.Liu@fticonsulting.com Telephone: 604.757.6108 403.454.6040 *Monitor*

McEwan Cooper Kirkpatrick LLP #1500 – 733 Seymour Street Vancouver, BC V6B 0S6 **Attention: David E. Gruber** **William Stransky** **Mila Ghorayeb** Email: dgruber@mcewanpartners.com wstransky@mcewanpartners.com mghorayeb@mcewanpartners.com Telephone: (604) 283-8051 (604) 283-8065 (778) 383-7274 *Counsel for the Monitor, FTI Consulting Canada Inc.*	Dentons Canada LLP 20th Floor, 250 Howe Street Vancouver, BC V6C 3R8 **Attention: Jordan Schultz** **Eamonn Watson** Email: jordan.schultz@dentons.com eamonn.watson@dentons.com Telephone: 604.691.6452 604.629.4997 *Counsel for China Shougang International Trade & Engineer Corporation*
Harper Grey LLP #3200 – 650 West Georgia Street Vancouver, BC V6B 4P7 **Attention: Erin Hatch** **Roselle Wu** Email: ehatch@harpergrey.com rwu@harpergrey.com Telephone: 604.895.2818 *Counsel for Canada Zhonghe Investment Ltd.*	Fasken Martineau DuMoulin LLP #2900 – 550 Burrard Street Vancouver, BC V6C 0A3 **Attention: Kibben Jackson** **Heidi Esslinger** **Jordan Beaulieu** Email: kjackson@fasken.com hesslinger@fasken.com jbeaulieu@fasken.com Telephone: 604.631.3131 *Counsel for Canadian Kailuan Dehua Mines Co., Ltd.*
Lawson Lundell LLP #1600 – 925 West Georgia Street Vancouver, BC V6C 3L2 **Attention: William L. Roberts** Email: wroberts@lawsonlundell.com Telephone: 604.631.9163 *Counsel for Accurate Court Bailiff Services Ltd.*	Weiheng Law 16th Floor, Tower A, China Technology Trading Building No. 66 North Fourth Ring West Road, Haidian District, Beijing **Attention: Wei Heng** Email: weiheng@weihenglaw.com Telephone: +86-10-62684688 *Counsel for Feicheng Mining Co., Ltd*

Borden Ladner Gervais LLP #1200 – 200 Burrard Street Vancouver, BC V7X 1T2 **Attention: Ryan Laity** **Jennifer Pepper** Email: RLaity@blg.com JPepper@blg.com Telephone: 604.632.3544 *Counsel for Huiyong Holdings (BC) Ltd.*	Fasken Martineau DuMoulin LLP #2900 – 550 Burrard Street Vancouver, BC V6C 0A3 **Attention: Fergus McDonnell** **Johanna Fipke** Email: fmcdonnell@fasken.com jfipke@fasken.com Telephone: 604.631.3220 *Counsel for Staray Capital Limited*
McMillan LLP #1500 – 1055 West Georgia Street Vancouver, BC V6E 4N7 **Attention: Daniel Shouldice** Email: Daniel.Shouldice@mcmillan.ca Telephone: 604.691.6858 *Counsel for HD Mining International Ltd.*	Fraser Litigation Group #1100 – 570 Granville Street Vancouver, BC V6C 3P1 **Attention: R. Barry Fraser** **Helen Liu** Email: bfraser@fraserlitigation.com hliu@fraserlitigation.com Telephone: 604.343.3101 *Counsel for Qu Bo Liu*
THC Lawyers Suite 2130, P.O. Box 321 Toronto, ON M5K 1K7 **Attention: Ran He** Email: rhe@thclawyers.ca Telephone: 647.792.7798 *Counsel for Feicheng Mining Group Co., Ltd.*	Department of Justice Canada British Columbia Regional Office 900 – 840 Howe Street Vancouver, BC V6Z 2S9 **Attention: Aminollah Sabzevari** **Julio Paoletti** Email: Aminollah.Sabzevari@justice.gc.ca Julio.Paoletti@justice.gc.ca Khanh.Gonzalez@justice.gc.ca Telephone: 587.930.5282 *Counsel for His Majesty the King in Right of Canada*

McEwan Cooper Kirkpatrick LLP #1500 – 733 Seymour Street Vancouver, BC V6B 0S6 **Attention: Robert Cooper, K.C.** Email: rcooper@mcewanpartners.com Telephone: 604.283.7677 *Counsel for Aref Amanat*	Nathanson, Schachter & Thompson LLP 750 – 900 Howe Street Vancouver, BC V6Z 2M4 **Attention: Stephen Schachter, K.C.** **Julia Lockhart** Email: SSchachter@nst.ca jlockhart@nst.ca Telephone: 778.945.1470 604.662.8840 *Counsel for West Moberly First Nation*
McMillan LLP #1500 - 1055 West Georgia Street Vancouver, BC V6E 4N7 **Attention: Bernhard J. Zinkhofer** E-mail: Bernhard.Zinkhofer@mcmillan.ca Telephone: (604) 691-7483 *Counsel for HBIS Group International Holding Co., Ltd. ("HBIS")*	Clark Wilson LLP #900 – 885 West Georgia Street Vancouver, BC V6C 3H1 **Attention: Christopher Ramsay** **Simon Wu** E-mail: CRamsay@cwilson.com SWu@cwilson.com Telephone: (604) 643-3176 *Counsel for 1562880 B.C. Ltd.*
Canada Revenue Agency c/o N.Sindu (462-11) 9755 King George Blvd. Surrey, BC V3T 5E6	CIBC – CEBA 400 Burrard Street Vancouver, BC V6C 3M5
Bullmoose Mining Ltd. 3577 West 34th Ave Vancouver, BC V6N 2K7	Canadian Dehua Lvliang International Mines Corp. #310 – 1155 West Pender Street Vancouver, BC V6E 2P4

Email Distribution List

1. Counsel:

colin.brousson@dlapiper.com; jeffrey.bradshaw@dlapiper.com; Craig.Munro@fticonsulting.com; Hailey.Liu@fticonsulting.com; dgruber@mcewanpartners.com; wstransky@mcewanpartners.com; mghorayeb@mcewanpartners.com; jordan.schultz@dentons.com; eamonn.watson@dentons.com; ehatch@harpergrey.com; rwu@harpergrey.com; kjackson@fasken.com; hesslinger@fasken.com; jbeaulieu@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; SSchachter@nst.ca; jlockhart@nst.ca; Bernhard.Zinkhofer@mcmillan.ca; CRamsay@cwilson.com; SWu@cwilson.com;

2. Support Staff:

ashley.kumar@ca.dlapiper.com; tinale@mcewanpartners.com; cron@mcewanpartners.com; CMagday@mcewanpartners.com; chelsea.denton@dentons.com; avic.arenas@dentons.com; cyoon@harpergrey.com; kbuquet@harpergrey.com; falijevski@blg.com; jmarcello@fraserlitigation.com; lansari@mcewanpartners.com; rrabey@nst.ca; melinda.yee@mcmillan.ca; mcreamore@nst.ca; JLanda@cwilson.com;

Schedule "B"

(Draft Order)

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.

PETITIONER

ORDER MADE AFTER APPLICATION

BEFORE	THE HONOURABLE JUSTICE P. WALKER	OCTOBER 21, 2026

ON THE APPLICATION of the Petitioner coming on for hearing at 800 Smithe Street, Vancouver, BC V6Z 2E1 on October 21, 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; 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 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 January 29, 2027.

GENERAL

3. This Order and all of its provisions are effective as of 12:01 a.m. local Vancouver time on the date hereof.

4. 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 Petitioner
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.

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.

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/

APPENDIX

THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other 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

Action 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 COMRPOMISE AND ARRANGEMENT OF
CANADIAN DEHUA INTERNATIONAL MINES GROUP INC.

PETITIONER

NOTICE OF APPLICATION

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

Tel. No. 604.687.9444
Fax No. 604.687.1612

File No.: 080762-00014 CH/AK