



This is the 1st affidavit
of Kaye Wong in this case
and was made on June 8, 2022

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.

PETITIONER

AFFIDAVIT

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

I, Kaye Wong, legal administrative assistant, of 3200 - 650 West Georgia Street, in the City of Vancouver, Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a legal administrative assistant with Harper Grey LLP, solicitors for 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 to this my affidavit and marked as **Exhibit "A"** is a true copy of an email correspondence from Erin Hatch, counsel for Canada Zhonghe Investment Ltd., to Colin Brousson, counsel for Canadian Dehua International Mines Group Inc., dated January 19, 2022, enclosures omitted.
3. Attached to this my affidavit and marked as **Exhibit "B"** is a true copy of an email correspondence between Ms. Hatch and Mr. Brousson, dated February 11, 2022.

- 4. Attached to this my affidavit and marked as **Exhibit "C"** is a true copy of an email correspondence between Alexis Teasdale, counsel for Accurate Court Bailiff Services Ltd., Ms. Hatch, and Mr. Brousson, dated April 19, 2022.

- 5. Attached to this my affidavit and marked as **Exhibit "D"** is a true copy of the certified translated documents by Tian Jue (Tony) He, dated June 8, 2022.

SWORN (OR AFFIRMED) BEFORE)
ME at Vancouver, in British Columbia, on)
 June 8, 2022)

Erin Hatch)

_____)
 A Commissioner for taking affidavits within)
 British Columbia)

Kaye Wong)

_____)
Kaye Wong)

Erin M. Hatch)
Barrister and Solicitor)

_____)
 (Print name or affix stamp of commissioner))

3250 Vancouver Centre)
 650 West Georgia Street)
 Vancouver, BC V6B 4P7)

Kaye Wong

From: Erin Hatch
Sent: Wednesday, January 19, 2022 3:05 PM
To: colin.brousson@dlapiper.com
Cc: Kaye Wong
Subject: RE: Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No. S-214547
Attachments: Default judgment - filed August 30, 2021.pdf; Letter to Canadian Dehua International Mines Group Inc re proposal - May 25, 2021.pdf; Letter to Canadian Dehua re settlement and enclose CDO - Jun 3, 2021.pdf; Consent Dismissal Order.pdf; Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No

Hi Colin,

Further to our telephone call, I have instructions to adjourn the January 27, 2022 generally, by consent, on the condition that you serve your filed application response and affidavit(s) by **February 7, 2022**. Once I review and determine whether I need to file a reply, you will also be agreeable to rescheduling the hearing date in a timely manner.

I attach a copy of my correspondence after the litigation was commenced (the NCC was filed on May 7, 2021). When your client failed to pay, we obtained the default judgment on August 30, 2021. It is evident from these correspondence that your client was well aware of the litigation and still chose not to respond. This was not a rush to judgment type of situation. I don't see any merit to an application to set aside the judgment.

As further discussed by telephone, I understand that your client again recently told my client he would pay the judgment by X date (I believe it was February 1, 2022) if my client agreed to adjourn the court application. If your client has the ability to pay the judgment in full, or a settlement proposal, please forward that and a court application may be avoided all together.

Regards,

Erin Hatch
Barrister & Solicitor | 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 Kaye Wong
sworn before me, at ... Vancouver
this 8 day of June 2022
.....
A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

Kaye Wong

From: Erin Hatch
Sent: Friday, February 11, 2022 11:06 AM
To: Brousson, Colin
Cc: Yang, Dannis; Kaye Wong
Subject: RE: [EXTERNAL] RE: Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No. S-214547 (the "Action")

Hi Colin,

On January 16, 2022, your client contacted my client directly via written correspondence and guaranteed payment in full to my client within 30 "working days". Taking into account the Chinese Spring Festival holiday, your client's payment is due on or before March 2, 2022. Accordingly, my instructions are to hold this matter in abeyance until that date, failing payment by your client I will then respond substantively to your email.

Regards,

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

This is Exhibit " B " referred to in the affidavit of Kaye Wong sworn before me, at Vancouver this 8 day of June, 2022.
[Signature]
A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA




Kaye Wong

From: William Roberts <wroberts@lawsonlundell.com>
Sent: Tuesday, April 19, 2022 3:19 PM
To: Brousson, Colin; Alexis Teasdale ; Erin Hatch
Cc: Peter Powers; He, Weiguo (William); Yang, Dannis
Subject: RE: [EXTERNAL] Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No. S-214547

Derek Lai at BDO
Mario at Bowra
Patty and Greg Ibbot at MNP

William L. Roberts* | Partner
Lawson Lundell LLP
D 604.631.9163 | F 604.641.4401
*Law Corporation

*This is Exhibit " C " referred to in the
affidavit ofkaye Wong.....
sworn before me, atVancouver.....
this8..... day ofJune....., 2022.....

A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA*

From: Brousson, Colin <colin.brousson@dlapiper.com>
Sent: Tuesday, April 19, 2022 2:44 PM
To: Alexis Teasdale (4564) - 11Flr <ateasdale@lawsonlundell.com>; ehatch@harpergrey.com
Cc: Peter Powers <peter.powers@aebailiffs.com>; William Roberts (3163) - 14Flr <wroberts@lawsonlundell.com>; He, Weiguo (William) <william.he@dlapiper.com>; Yang, Dannis <dannis.yang@dlapiper.com>
Subject: RE: [EXTERNAL] Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No. S-214547

Alexis,

Thanks for the information. Can you kindly advise to which three insolvency trustee firms you have sent the request for proposals?

Yours truly,

Colin Brousson
Partner

T +1 604.643.6400
F +1 604.605.4875
E colin.brousson@dlapiper.com

From: Alexis Teasdale <ateasdale@lawsonlundell.com>
Sent: Tuesday, April 19, 2022 1:15 PM
To: ehatch@harpergrey.com; Brousson, Colin <colin.brousson@ca.dlapiper.com>
Cc: Peter Powers <peter.powers@aebailiffs.com>; William Roberts <wroberts@lawsonlundell.com>
Subject: [EXTERNAL] Canada Zhonghe Investment Ltd. v. Canadian Dehua International Mines Group Inc.; SCBC Vancouver Registry Action No. S-214547

DLA Piper (Canada) LLP ALERT: This is an external email. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Good afternoon Erin and Colin,

As you know, Lawson Lundell LLP has been retained by Accurate Court Bailiff Services Ltd. ("Accurate") as bailiff under the Writ of Seizure and Sale issued against Canadian Dehua International Mines Group Inc. by the Supreme Court of British Columbia in the above-captioned action on September 10, 2021.

For your information, on Thursday, April 14, 2022, our office, on behalf of Accurate, sent a request for proposals to three licensed insolvency trustee firms to conduct a sale solicitation process ("SSP") to market and obtain a binding offer, subject to court approval, for the 24 common shares of Canadian Kailuan Dehua Mines Co. Ltd. held by Canadian Dehua International Mines Group Inc. Proposals for the SSP are due on April 26, 2022. We also intend to seek court approval of the proposed SSP before commencing same.

Please let us know if you have any questions.

Best regards,



ALEXIS TEASDALE* (she/her) | Partner
D 403.218.7564 | F 403.269.9494 | E ateasdale@lawsonlundell.com
LAWSON LUNDELL LLP Suite 1100, 225 - 6th Avenue S.W., Brookfield Place, Calgary, AB T2P 1N2
Vancouver | Calgary | Yellowknife | Kelowna
*Professional Corporation

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**Tian Jue (Tony) He – CERTIFIED MEMBER OF STIBC
CHINESE to ENGLISH**

332 St. Urbain Dr., Woodbridge, ON L4H 0M3 CANADA
Tel: (647) 227-3746; email: utony.htj@gmail.com

**Certified Member of Society of Translators and Interpreters of BC - Canada
STIBC Member No: 04-10-3659**

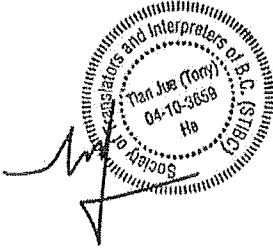
TRANSLATOR'S STATEMENT

I, **Tian Jue (Tony) He**, Certified Member of the Society of Translators and Interpreters of British Columbia, language combination **Chinese to English**, member in **good standing**, member no: **04-10-3659**, hereby declare that I did translate into **ENGLISH** the attached **CHINESE** document and that, to the best of my knowledge, the translation accurately reflects the contents and meaning of the **CHINESE** original.

Attached on Separate Pages:

- 1. Copy of Canadian Kailuan Dehua Mines Co., Ltd. Vote at the 2020 Annual Meeting of Shareholders in Simplified Chinese
- 2. Translated version of Canadian Kailuan Dehua Mines Co., Ltd. Vote at the 2020 Annual Meeting of Shareholders in English
- 3. Copy of Agreement on the refund of investment from Canadian Zhonghe Investment Ltd. in the Bullmoose Mine project in Simplified Chinese
- 4. Translated version of Agreement on the refund of investment from Canadian Zhonghe Investment Ltd. in the Bullmoose Mine project in English

**Please note that STIBC is a member of Canadian Translators, Terminologists, and Interpreters Council (CTTIC) by affiliation.*



Date: 2022/06/08

Tian Jue (Tony) He

STIBC Certified Translator

This is Exhibit "D" referred to in the
 affidavit of Kayz Wang
 sworn before me, at Vancouver
 this 8 day of JUNE, 2022
[Signature]

A COMMISSIONER FOR TAKING
AFFIDAVITS FOR BRITISH COLUMBIA

Canadian Kailuan Dehua Mines Co., Ltd.
Vote at the 2020 Annual Meeting of Shareholders

(June 30, 2021)

Shareholder representative or authorized proxy shareholder representative (signature): [Signature] Liu Naishun

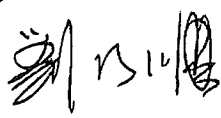
No.	Motion	Yes	No	Abstention
1	Proposal on the Company's 2020 work summary and report on the 2021 work plan	✓		
2	Proposal on the Company's financial work in 2020 and report on the 2021 financial budget	✓		



- Note:
1. Please enter "✓" in the "Yes", "No", or "Abstention" column;
 2. Only one "✓" shall be entered for each item. If you do not enter a "✓" or more than one "✓" is entered, the vote will be deemed invalid.

加拿大开滦德华矿业有限公司 2020 年度股东会议案表决票

(2021 年 6 月 30 日)

股东代表或授权委托股东代表 (签名): 

序号	议 案	同意	反对	弃权
1	关于公司 2020 年度主要工作及 2021 年度工作计划报告的议案	✓		
2	关于公司 2020 年度财务工作及 2021 年度财务预算报告的议案	✓		

注: 1.请在相应的“同意”、“反对”、“弃权”表决栏内打“√”;
2.每一表决事项只能打一个“√”,多打或不打为弃权。

**Agreement on the refund of investment from
Canadian Zhonghe Investment Ltd. in the Bullmoose Mine project**

Party A: Canadian Dehua International Mines Group Inc.

Party B: Canadian Zhonghe Investment Ltd

The parties A and B shall terminate the Bullmoose Mine Cooperation Project and have reached the terms of the agreement after friendly negotiation, which shall be abided by and implemented by both parties.

1. Party A undertakes to pay Party B a lump sum of USD 3,922,000 within 5 business days after Party B withdraws its case from the Supreme Court of British Columbia.
2. There shall be no more economic or other disputes between Parties A and B.
3. If Party A fails to pay Party B USD 3,922,000 in one lump sum within 5 business days after Party B withdraws its case from the Supreme Court of British Columbia, this Agreement shall become invalid, and Party B shall have the right to continue suing Party A.
4. If Party B violates this Agreement, Party A has the right to refuse to pay any amount to Party B based on the contract and evidence held by Party A.
5. This Agreement shall be made in 4 copies, with Party A and Party B each holding 2 copies.
6. This Agreement shall enter into force on the date of signature and seal of both Parties A and Party B.

Party A: Canadian Dehua
International Mines Group Inc.

Party B: Canadian Zhonghe
Investment Ltd

[Seal] Canadian Dehua
International Mines Group Inc.
[Signature] Liu Naishun

Liu Naishun (President)
Date: May 25, 2021

Date: May , 2021

关于退还加拿大中和投资公司 在 Bullmoose 煤矿项目中的投资款之协议书

甲方: Canadian Dehua International Mines Group Inc.
加拿大德华国际矿业集团公司

乙方: Canadian Zhonghe Investment Ltd
加拿大中和投资公司

甲、乙双方就终止 Bullmoose 煤矿合作项目, 经友好协商达成以下协议条款, 双方共同遵守执行。

1. 甲方承诺乙方从 BC 省高等法院撤诉后的 5 个工作日内, 一次性支付乙方 3, 922, 000 美元。
2. 甲、乙双方不再有任何经济纠纷和其它纠纷。
3. 如果甲方未能在乙方从 BC 省高等法院撤诉后的 5 个工作日内, 一次性支付乙方 3, 922, 000 美元, 则本协议失效, 乙方有权继续起诉甲方。
4. 如果乙方违反本协议, 则甲方有权依据自方执有的合同和证据拒绝支付乙方的任何款额。
5. 本协议一式 4 份, 甲乙双方各执 2 份。
6. 本协议自甲、乙双方签字、盖章之日起生效。

甲方: 加拿大德华国际矿业集团公司



刘万顺(总裁)

日期: 2021 年 05 月 25 日

乙方: 加拿大中和投资公司

日期: 2021 年 05 月 日