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May 13, 2015

OTC Markets Group, Inc.
304 Hudson Street
Third Floor
New York, New York 10013

Re: iPure Labs, Inc.
(Trading Symbol: IPLB)

Ladies and Gentlemen:

Please be advised that this law firm is outside counsel to iPure Labs, Inc. (Trading Symbol: IPLB). This firm has been retained by iPure Labs to render an opinion as to whether there is adequate current information in connection with the filing by the Issuer of its Annual Statement on April 8, 2015 (the "Disclosure Statement") which incorporated unaudited financial information as of and for the period February 10, 2014 through December 31, 2014. OTC Markets is entitled to reply on this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rue 144(c)(2) under the Securities Act of 1933. OTC Markets has full and complete permission and rights to publish this letter with OTC Markets for viewing by the general public and regulators but no person other than OTC Markets may rely upon this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933.

In rendering this opinion, I have examined corporate records, publicly available documents and analyzed questions of law for the purpose of rendering this opinion, including but not limited to the following documents:

(a) Articles of Incorporation of predecessor of Issuer and certificates of amendments filed with the state of Nevada;

(b) Certificate of Designations establishing preferred stock;

(c) Bylaws of the Issuer;

(d) Private Placement Memorandums and other stock issuance documents;

(e) Shareholder list of Issuer;

(f) The Issuer's prior filings on OTC Markets, Inc. including: i) Annual Report published on October 20, 2014 for period ending December 31, 2013; Interim Financial Report published on November 3, 2014 for the period ending July 31, 2014; Quarterly Report published November 3, 2014 for the period ending September 30, 2014.

(g) Condensed Balance Sheet for year 2014;

(h) News releases, website, and other substantive materials which document the operations of the Issuer;

I have assumed that (i) all information contained in all documents reviewed by me is true and correct, (ii) all signatures on all documents reviewed by me are genuine, (iii) all documents submitted to me are true and complete copies of the originals thereof and (v) each natural person signing any document reviewed by me had the legal capacity to do so. As to issues of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, and those sources are believed to be reliable.

The Issuer has posted its most recent Annual Report OTC Disclosure and News Services on April 8, 2015. I have reviewed the Annual Report as well as the prior Quarterly Reports, and, after a reasonable investigation, including meeting personally with management and officers of the iPure Labs to discuss the published information, have no reason to believe that, at the time such information was published on the OTC Markets, the information contained any untrue statements of material fact or omitted to state a material fact necessary to make the statements made misleading.

It is my opinion that the information (i) constitutes "adequate current information" concerning the Issuers securities and is "available," within the meaning of Rule 144(c)(2) under the United States Securities Act of 1933, as amended, (ii) the information includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for such Issuer's securities under Rule 15c2-11 under the United States Securities Exchange Act of 1934, as amended, (iii) complies as to form with the OTC Markets Group's OTC Pink Disclosure Guidelines, which are located on the Internet at www.otcmarkets.com, and (iv) the information has been posted through the OTC Disclosure and News Service.

Other matters related to this opinion are as follows:

1) The person responsible for the preparation of the unaudited financial statements and notes thereto contained in the Annual Report is the Issuer's Chief Executive Officer, Christopher Pearce, who we believe to have sufficient experience in these matters. Bongiovanni & Associates, PA, certified public accountants, 7951 SW 6th Street, Suite 216, Plantation, Florida 33324-3276 also assisted in the preparation of the financial information and notes thereto. The financial statements are certified by an officer of the Issuer to present fairly, in all material respects, the financial accounting principles generally accepted in the United States of America, consistently applied.

In the opinion of management, all adjustments considered necessary for fair presentation have been included in the financial statements.

2) The Issuer's transfer agent is Transfer Online, 512 SE Salmon Street, Portland, Oregon 97214 which is registered with the SEC. I relied on information provided to me by the transfer agent in the form of a shareholders list to confirm the number of outstanding shares.

3) I have (i) personally met with management and the directors of the Issuer, (ii) reviewed the information published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and directors of the Issuer.

4) To the best of my knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer of the securities, any 5% holder of such securities, nor counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

5) I am a resident of California and reside in that State in the United States of America. Counsel has been retained by the Issuer for the purpose of rendering this letter and related matters. I am authorized to practice law in the States of California and Hawaii and before the United State District Court in the Southern and Central Districts of California. I am permitted to practice before the United States Securities and Exchange Commission and have not been prohibited from practice there under.

Sincerely,



Gina M. Austin, Esq.