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October 2, 2015

Issuer Services
OTC Markets Group, Inc.
304 Hudson Street
New York, New York 10013

Re: Novagant Corp. (formerly Petrogulf, Inc.), a Nevada corporation (the "Issuer")

Gentlemen/Ladies:

Please be advised as follows:

1. OTC Markets Group, Inc. is entitled to rely on this letter in determining whether Issuer has made current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933.

2. I am a United States resident and have been retained by the Issuer for the purpose of rendering this letter and other matters; specifically, I am a law firm acting as general counsel to the Issuer.

3. I have examined such corporate records and other documents and such questions of law as I considered necessary or appropriate for purposes of rendering this letter.

4. I am authorized to practice law in the State of California. This letter applies to the United States of America and all jurisdictions therein. This letter does not rely on the work of other counsel.

5. I am permitted to practice before the United States Securities and Exchange Commission (the "SEC") and have not been prohibited from practicing thereunder.

6. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources and all such sources are believed to be reliable. In my examination, I have assumed the genuineness of all documents submitted to us as originals, the conformity to original documents of all documents submitted to us as photostatic copies, and authenticity of the originals of such latter documents.

7. I have reviewed the following report posted on October 2, 2015, the Annual disclosure document with included financials reports and footnotes for the years ended December 31, 2014 and 2013. It is my opinion that said documents are accurate, up to date and contains the most current information available on the Issuer.

8. The information referred to above (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act, (ii) includes all of the information that a broker-dealer would require to obtain from the issuer to publish a quotation for the Securities under Rule 15c-2-11 under the Securities Exchange Act of 1933 (the "Exchange Act"), (iii) complies as to form with the OTC Markets Group Inc.'s Guidelines for Providing Adequate Current Information, which are located

on the Internet at www.otcmarket.com, and (iv) has been posted through the OTC Disclosure and News Service.

9. The person responsible for the preparation of the financial statements contained in the information is Michael Berg, Berg & Co., 505 Sansome Street, Suite 850, San Francisco, CA 94133. The financial statements have not been audited.

10. The Issuer's transfer agent is Corporate Stock Transfer. The transfer agent is registered with the SEC. I have confirmed the number of outstanding shares in the information by reviewing the shareholder list and communicating with the transfer agent.

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

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

13. This letter is given solely to you, and may not be released to or relied upon by, nor is it intended to benefit, any other person or for any other purpose without our prior written consent; provided, however, OTC Markets Group, Inc. has full and complete permission to publish the letter through the OTC Disclosure and News Service for viewing by the public and regulators.

Very truly yours,

F. ROBBE INTERNATIONAL
ATTORNEYS AT LAW



By:_____
Fletcher A. Robbe

FAR/eer
cc: Novagant Corp.
Shar Pourdanesh, President