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June 12, 2020

OTC Markets Group, Inc.
304 Hudson Street, 2nd Floor
New York, NY 10013

Re: Zhuding International Corporation
Trading symbol: ZHUD

Ladies and Gentlemen:

I have been engaged as special counsel to Zhuding International Corporation, a Nevada corporation with its executive office located at 20th Floor, Block 9, Thaihot Plaza, Hengy, Fuzhou 89702 China ("Issuer"), to provide this letter with respect to the information ("Information") publicly disclosed by the Issuer and published through the OTC Disclosure and News Service, including all information published at <http://www.otcm Markets.com/stock/ZHUD/profile> and related pages. The current Disclosure Statement is prepared using the OTC Pink Basic Disclosure Guidelines (v2.1 December 2019). The Issuer's common stock ("Securities") is quoted on OTC Markets as an OTC Pink and is traded on the over-the-counter market. Please be advised that OTC Markets Group is entitled to rely on this letter in determining whether the Issuer has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 ("Securities Act"). It should be noted that Rule 144(c)(2) does not define or provide a standard for public availability of information. In using this term, I refer to any information which is available to the public from any source, including information which requires payment of a fee to a public official. In particular, the Rule does not require publication of information on or through the OTC Disclosure and News Service.

The Information covered by this opinion includes and is limited to information under the Issuer's control on the "Company Info" page and the items of information indexed on the "Disclosure" page, as follows:

<u>OTC Information Item</u>	<u>Period End Date</u>	<u>Published Date</u>
Annual Report – Quarterly Report 1Q2020	3/31/2020	6/08/2020
Annual Report – Annual Report 2019	12/31/2019	6/08/2020
Annual Report – Annual Report 2018	12/31/2018	6/08/2020

I am a resident of the United States of America. From time to time, I have provided and expect to provide legal services to the Issuer in the areas of corporate, business transactions and securities law. I currently do not own any stock in the Issuer. I have not received and have no agreement to receive in the future any shares of the Issuer's stock in payment for services. I now have and have had no relationship with the Issuer, except as set forth above. I am licensed to practice law in California. The subject matter of this letter covers the jurisdictions of the State of Nevada (the Issuer's jurisdiction of incorporation) specifically limited to matters under the Nevada Revised Statutes and the laws of the United States of America. I have not relied on the work of any other attorney in rendering the opinions set forth below. I am permitted to practice before the U.S. Securities and Exchange Commission and am not prohibited from such practice.

For the purpose of this letter, I have reviewed, to the extent I deem relevant to the matters covered by this letter, and relied upon the following:

Documents publicly available:

- a true copy of the Amended Articles of Incorporation of the Issuer and all amendments thereto, originally filed on April 16, 2009 with the OTC Markets;
- a true copy of the By-Laws of the Issuer and all amendments thereto, originally filed on April 16, 2009 with the OTC Markets;
- information published by the Issuer through the OTC Disclosure and News Service on OTCMarkets at the Internet address of <http://www.otcm Markets.com/stock/ZHUD/profile> and related pages, in particular, the documents listed on the "Filings" page in the active category;
 - Company's Unaudited financial statements for the years ended December 31, 2019 and 2018 including:
 - (A) Consolidated Balance Sheet for the periods ended December 31, 2019, and 2018;
 - (B) Consolidated Statements of Operations for the years ended December 31, 2019, and 2018;
 - (C) Consolidated Statements of Cash Flows for the periods ended December 31, 2019, and 2018;
 - (D) Consolidated Statement of Stockholders' Deficit for the periods ended December 31, 2019, and 2018; and,
 - (E) Notes to the Consolidated Financial Statements; and,
 - Company's Unaudited financial statements for the period ended March 31, 2020, including:
 - (A) Consolidated Balance Sheet at March 31, 2020,
 - (B) Consolidated Statement of Operations for the period ended March 31, 2020,
 - (C) Consolidated Statement of Cash Flows for the period ended March 31, 2020,
 - (D) Consolidated Statement of Stockholders' Deficit for the period ended March 31, 2020,
 - (E) Notes to Financial Statements; and,

Documents not publicly available:

- a confirmation of the shareholder report as of December 31, 2018, December 31, 2019, and March 31, 2020 of the Issuer ("Shareholder Report") provided to me by the Company and the Transfer Agent.

I have also reviewed and relied upon such other documents and certificates of the Issuer and of public officials as I have deemed necessary and relevant to the subject matter of this letter. I have assumed the due and proper election or appointment of all persons signing and purporting to sign the documents in their respective capacities, as stated therein, the genuineness of all signatures, the conformity to authentic original documents of the copies of all such documents submitted to me as certified, true, conformed and photocopied, including the quoted, extracted, excerpted and reprocessed text of such documents. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, which I believe to be reliable.

I have also reviewed and am familiar with Rule 144 under the Securities Act and Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"). It should be noted that the only information required by Rule 144(c)(2) that is required to be publicly available is limited to the information identified in paragraphs (a)(5)(i) to (xiv) and (a)(5)(xvi) of Rule 15c2-11. The required information is less extensive than the information identified in OTC Pink Basic Disclosure Guidelines v2.1 December 2019. It should be noted that the OTC Markets "Alternative Reporting Standard" is a voluntary, privately operated system unrelated to the statutory reporting requirements set forth in Sections 13 and 15(d) of the Exchange Act.

The Information (i) constitutes "adequate current public information" concerning the Securities and the Issuer and "is available" within my understanding of the meaning of Rule 144(c)(2) under the Securities Act, (ii) includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Securities under Rule 15c2-11 under the Securities Exchange Act of 1934 (the "Exchange Act"), (iii) complies as to

form with OTC Markets Group's Pink Basic Disclosure Guidelines v2.1 December 2019, which are located on the Internet at www.otcm Markets.com, and (iv) has been posted through the OTC Disclosure and News Service.

I have been advised by the Issuer that Antony Chung, as financial adviser, and accountant to Zhuding International Limited, Mr. Chung is responsible for all of the company's financial functions including accounting, audit, and corporate finance, his address is 20th Floor, Block 9, Thaihot Plaza, Hengy, Fuzhou 89702 China. The financial statements are not audited. His career spans more than twenty-five years of varied accounting and financial experience including financial management. Mr. Chung, earned a Bachelor of International Accounting from the Fuzhou University, China. The primary officer reviewing and approving the Company's financial statements is Mr. Mulin Xiang the Issuer's CEO and CFO. Mr. Xiang, our CEO and CFO, since 2016, brings over 21 years of experience to the business. A mechanical engineering undergraduate from the prestigious Shanghai Jiatong University. Mr. Mulin joined Fuzhou Junda Trading Co. Ltd., in 1991 as the General Manager before taking on top management responsibilities in Fuzhou Hongtai Air Conditioning Co. Ltd and Shanghai Huayuan Kaima Machinery Co. Ltd.

The Transfer Agent, Pacific Stock Transfer Co. (the "Transfer Agent") address 6725 Via Austi Parkway, Suite 300, Las Vegas, NV 89119. The Transfer Agent is registered with the SEC. I confirmed the number of outstanding shares of the Issuer set forth in the Information by reviewing the shareholder report labeled Zhuding International Corporation, Shareholder Report as of 12/31/2018, 12/31/2019, and 3/31/20 provided by the Issuer from its Transfer Agent.

The SEC, as of May 2016, is conducting a fact-finding investigation, into whether, I, or others associated with various publicly traded companies, may have engaged in securities registration violations by participating in filing registration statements which may contain false information about those companies' control persons or promoters. The SEC's is also conducting a fact-finding investigation into whether or not, attorney opinion letters were authored that are potentially false and misleading and that may be part of unregistered distributions of securities. The SEC to date, has not determined that I have violated any securities laws. Other than the aforementioned investigation, I am not currently nor have been, in the past five years, subject of an investigation, hearing, or proceeding, by the U.S. Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency or barred from practicing in any state or jurisdiction, and have not been charged in a civil or criminal case.

I have personally met with management and a majority of the directors of the Issuer, namely, Mr. Mulin Xiang (CEO / CFO / Director), Aizhen Deng (Director), and Wah Ming Chiu (Director), via (i) Video Conference calls, (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

To the best of my knowledge, after inquiry of management and a majority of the directors of the Issuer, neither the Issuer, or any five percent holder of the Issuer's securities is, currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

The Issuer has been a "shell company" in its past, as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

Counsel has relied on information obtained from public officials, the officer and the director of the Issuer, and other sources. Counsel has no reason to believe that the records, certificates, or other documents of the Issuer (that I have reviewed) are not accurate, authentic, or reliable. The opinion expressed above is subject to the following assumptions, exceptions and qualifications:

- a. I have assumed that (i) all information in all documents reviewed by counsel is true and correct, (ii) all signatures on all documents reviewed by myself are genuine, (iii) all documents submitted to myself as originals are true and complete, (iv) all documents submitted to myself as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by myself had the legal capacity to do so.

- b. I have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that I have reviewed in connection with the foregoing opinion.

No person other than OTC Markets is entitled to rely on this letter. Notwithstanding this limitation of reliance, I hereby grant OTC Markets full and complete permission and right to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulatory agencies; provided, that such permission to publish and the publication hereof shall not be deemed a waiver of the limitations of reliance set forth in this paragraph.

Yours Truly,

/s/Andrew Coldicutt

Andrew Coldicutt