

ROBERT C. LASKOWSKI

LAW OFFICE
520 S.W. YAMHILL
SUITE 600

PORTLAND, OREGON 97204-1329

TELEPHONE 503-241-0780
FACSIMILE 503-227-2980
EMAIL RCL@ROBLAW.US

April 6, 2017

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

***IN OVATIONS HOLDINGS, INC.
ANNUAL REPORT DATED April 5, 2017
FOR THE FISCAL YEAR ENDED JUNE 30, 2016***

Ladies and Gentlemen:

You are entitled to rely on this letter in determining whether In Ovations Holdings, Inc. ("*Company*") has made adequate current information publicly available within the meaning of Rule 144 (c)(2) under the Securities Act of 1933, as amended ("*Securities Act*").

The undersigned is a resident of the United States. Our office has been engaged by the Company to be its corporate and securities counsel. Our services include preparing or reviewing disclosure information and press releases, interfacing with the chief financial officer and independent accountants, and giving general legal advice to management.

We have examined such corporate records and other documents and have asked such questions of law as we have considered necessary or appropriate for the purpose of writing this letter. We have relied on publicly available information from the Secretary of State of the State of Colorado and information obtained from the Company's officers and directors. We believe the sources I have relied upon are reliable.

Our letter relates to the laws of the United States, specifically the Securities Act and the corporate laws of the State of Nevada. The undersigned is member in good standing of the bar of the State of Oregon since 1971 and is permitted to practice before the Securities and Exchange Commission ("*SEC*") and the undersigned has not been prohibited from practice thereunder.

The Company is not a reporting issuer under the Securities Exchange Act of 1934 ("*Exchange Act*") and, therefore, does not file periodic reports with the SEC. We have reviewed publicly available information relating to the Company posted through the OTC Disclosure and News Service and the Issuer's Annual Report dated April 5, 2017 for the fiscal year ended June 30, 2016 ("*Report*") posted through the OTC Disclosure and News Service.

The Report constitutes, in our opinion, adequate current public information concerning the Company's securities and is available within the meaning of Rule 144(c)(2) under the Securities Act. It includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the securities under Rule 15c2-11 under the Exchange Act and complies as to form with the OTC Pink Basic Disclosure Guidelines v1.1 April 25, 2013, which are located on the Internet at www.otcmarkets.com and been posted through the OTC Disclosure & News Service.

The person responsible for the preparation of the financial statements contained in the Report was Antonio Moura who is qualified to prepare the financial statements. The financial statements included in the Information Statement have not been audited.

The Company's transfer agent is Madison Stock Transfer, which is registered with the SEC. The method used to confirm the number of outstanding shares of common stock set forth in the Information Statement was to contact the transfer agent and receive written confirmation as to the number of outstanding shares.

The undersigned has personally met with management and a majority of the directors of the Company. The undersigned has reviewed the Report. The undersigned discussed the disclosed information with management and a majority of the directors of the Company.

To the best of my knowledge, after inquiry of management and the directors of the Company, no officer, director or 5% or greater holder of the outstanding securities of the Company, or counsel, is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

No person other than OTC Markets Group, Inc. is entitled to rely on this letter. However, the undersigned hereby grants OTC Markets Group, Inc. full and complete permission and rights to publish this letter in the OTC Disclosure and News Service for viewing by the public and regulators.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert C. Laskowski", written in a cursive style.

Robert C. Laskowski