

THE LAW OFFICES OF DAVID CHALELA, P.A.

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OTC Markets Group
304 Hudson Street, 3rd Floor
New York, NY 10013

April 21, 2011

RE: Updated Legal Opinion for Everybody's Phone Company Regarding Adequate Current Information and Annual Disclosure Requirements

This letter serves for OTC Markets Group Inc. ("OTC Markets Group") to rely upon in determining whether Everybody's Phone Company (EVPH) has, in its updated Annual Report, Management Development and Analysis April 20, 2011 posting, made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933. The undersigned counsel, David F. Chalela, Esq., is a U.S. Citizen and has been retained by EVPH as general counsel as well as for the purpose of rendering this legal opinion letter and related matters.

I have examined the various corporate records and documents and related questions of law necessary and appropriate for the preparation and performance of a thorough legal review and for the issuance of this letter. For clarification, EVPH initially filed its 2010 Annual Report with on OTCmarkets.com on March 30, 2011. OTC Markets requested some additional address information from EVPH. Thus, EVPH posted an updated 2010 Annual Report with OTCmarkets.com on April 20, 2011, with the requested information included. I have reviewed these documents, along with the requested additional information.

I am licensed to practice before all Florida state courts; the U.S. District Court, Middle District of Florida; the U.S. Court of Appeals, 11th Circuit; and the U.S. Court of Appeals for the Armed Forces. I am permitted to practice before the Securities and Exchange Commission ("SEC") and have never been prohibited from practice in any jurisdiction or court.

I have not relied upon the work of any other counsel in the preparation of this letter.

In preparing this legal opinion, I have relied upon Steven Bethke, President; Norman George, CFO, Vice President; and Kim Peterson, Director. In my opinion, and to the best of my knowledge, the above individuals were highly credible and reliable, as was all the information they provided.

In preparing this opinion, I reviewed the following documents:

1. EVPH Original Articles of Incorporation, dated September 2, 2003

2. EVPH Certificate of Incorporation, dated September 2, 2003
3. EVPH Certificate of Account Status, dated October 6, 2009
4. EVPH Amended Articles of Incorporation, dated January 3, 2011
5. EVPH By-Laws, dated September 1, 2003
6. Corporate Minutes of the Board of Directors and Shareholders
7. Rule 144 and Rule 10b5-1 compliance forms and related paperwork
8. EVPH Transaction Journal for All Stock Classes, dated April 1, 2011
9. EVPH Shareholder Certificate Details, dated April 1, 2011
10. Annual Report, Management Discussion and Analysis for year ending December 31, 2010, posted March 30, 2011.
11. Financial Statements for year ending December 31, 2010, dated March 30, 2011.
12. Updated Annual Report, Management Discussion and Analysis, posted on April 20, 2011
13. Various other corporate records necessary and prepared by management
14. The undersigned met with management and reviewed operations

At present, “adequate public information” is available concerning the securities, as that term has been defined in Rule 144(c)(2) of the Securities Act; 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”); complies as to form with the OTC Markets Group’s Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com; and has been posted through the OTC Disclosure and News Service, as certified by Steve Bethke, CEO.

The party responsible for the preparation of the financial statements of the issuer is:

Norman George, VP/CFO
Everybody’s Phone Company
6666 Harwin, Suite 664
Houston, TX 77036

The Fiscal Year End for EVPH is December 31.

Norman George is a graduate of the University of Texas with a degree in accounting. He has been an accountant for over 30 years and is a former employee of Peat, Marwick, and Mitchell accounting firm.

EVPH’s transfer agent is:

Olde Monmouth Stock Transfer Co., Inc.
Matthew J. Troster
200 Memorial Parkway
Atlantic Highlands, NJ 07716

This transfer agent is registered with the SEC. In order to confirm the number of

outstanding shares, I asked the Issuer to cause the transfer agent to send a current stockholder's list and to confirm in writing the number of shares outstanding. On April 1, 2011, Olde Monmouth Stock Transfer Co., Inc. provided a current shareholder report and confirmed there were 181,291,465 shares outstanding. To the best of my knowledge, information, and belief, after an inquiry of the aforementioned, no additional shares were issued.

I have personally met with management and the director majority; I have reviewed the information, as amended published by the Issuer through the OTC Disclosure and News Services; and discussed the Information with management and the director majority.

After inquiry of management and director majority, to the best of my knowledge, neither the Issuer, nor any 5% or greater holder, nor the undersigned 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 is entitled to rely on this legal review. I hereby grant OTC Markets Group full and complete permission and rights to publish this letter through the OTC Disclosure and News Service for viewing by the public and regulators.

I do not express any opinion herein concerning any law other than the laws of the United States and the jurisdictions where I am permitted to render opinions. I hereby furnish this opinion solely for the benefit of Pink Sheets and the Issuer. This opinion is therefore to be used for that sole purpose. I do not assume, nor imply, any responsibility or obligation to make updates to this opinion beyond the date of this letter.

The undersigned has reviewed the promotional activities of EVPH. The following addresses each executive officer, director, general partner, and other control persons and; for any promoter, finder, consultant, or any other advisor to EVPH, that assisted, prepared or provided information with respect to EVPH's disclosure or who received securities as consideration for services rendered to EVPH:

<u>Name</u>	<u>Shares Held</u>	
Steven H. Bethke 6666 Harwin, Suite 664 Houston, TX 77036	24,110,000	13.30%
Norman George 6666 Harwin, Suite 664 Houston, TX 77036	27,800,000	15.33%
Kim T. Peterson 6666 Harwin, Suite 664 Houston, TX 77036	27,860,000	15.37%

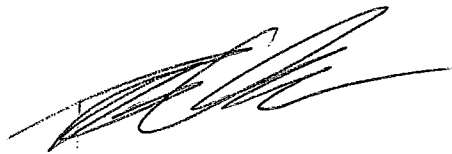
Steven H. Bethke and Norman George prepared the MD&A; financial reports were posted with OTC Markets alternative reporting service. No other person assisted with this work.

All shares issued to Mr. Bethke, Mr. Peterson, and Mr. George bear a restrictive legend upon the paper stock certificates and are listed on the master shareholder of record report as maintained and issued by Old Monmouth Stock Transfer Inc. which is the transfer agent of record for the company. All shares issued by EVPH to Mr. Bethke, Mr. George, and Mr. Peterson were issued per the language contained in their employment agreements.

Additionally, EVPH issued 1,000,000 shares of common stock without restrictive legend for legal services provided by Securus Law Group, P.A., 13046 Racetrack Road, Number 243, Tampa, FL 33626.

The undersigned has made a specific inquiry of each of the persons listed above. Based upon such inquiries and other information available to me, any sales of the Securities by Insiders within the twelve month period prior to this legal opinion have been made in compliance with Rule 144, including, without limitation, any required filings of Form 144, and nothing has come to my attention indicating that any of the Insiders is in possession of any material non-public information regarding the Issuer or the Securities that would prohibit any of them from buying or selling the Securities under Rules 10b-5 or 10b5-1 under the Exchange Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Chalela', with a long horizontal flourish extending to the right.

David F. Chalela, Esq.