

JONATHAN D. LEINWAND, P.A.

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May 16, 2022

OTC Markets Group, LLC
300 Vesey Street, 12th Floor
New York, New York 10282

Re: MedX Holdings, Inc.
Opinion of Counsel regarding adequate current information

Dear Sir or Madam:

This firm has been retained by **MedX Holdings, Inc.** (“**MedX**” or the “**Company**”) for the purpose of preparing this Opinion of Counsel, applying the applicable laws of the United States, regarding its corporate operations and level of disclosure of corporate information with regard to the Pink OTC Markets Disclosure Guidelines.

In the course of preparing this opinion, counsel has reviewed the following documents relating to the Company (together with the date they were posted through the OTC Disclosure and News Service, if applicable):

PUBLISH DATE	TITLE	PERIOD END DATE
05/03/2022	Quarterly Report - Quarterly Report 03-31-22	03/31/2022
04/29/2022	Annual Report - Annual Period Ending 12-31-21	12/31/2021
04/29/2022	Quarterly Report - Quarterly Report 09-30-21	09/30/2021
08/12/2021	Quarterly Report - Quarterly Report 06-30-21	06/30/2021
05/11/2021	Quarterly Report - Quarterly Report 03-31-21	03/31/2021
03/10/2021	Attorney Letter with Respect to Current Information - Attorney Letter Period 12-31-20	12/31/2020
03/09/2021	Annual Report - Annual Period Ending 12-31-20	12/31/2020
11/12/2020	Quarterly Report - period ending 09-30-20	09/30/2020

Counsel has also examined other related corporate information as necessary and information provided by the Company’s management for the purposes of this letter.

Additionally, counsel has personally conferred with Mr. Hans Enriquez, the Company’s CEO and Director, and discussed the information contained in the Company’s disclosure statements.

The opinions and conclusions contained in this Opinion Letter are based upon documentation and facts made available to this firm and are solely based on the accuracy of those documents and facts. All such information is believed to be accurate and reliable. In the event that the facts and information in any or all of such documents are determined not to be true, this opinion is rescinded to and to be deemed null and void. Counsel has discussed the above documentation, and the underlying assumptions this firm is relying upon, with the management of the Company.

The Company has 1,000,000,000 (One Billion) authorized common shares of which 690,499,016 shares were issued and outstanding as of May 13, 2022. There are 180,000,000 (One Hundred Eighty Million) preferred shares authorized of which 86,950,000 (Eighty-Six Million Nine Hundred Fifty Thousand) are issued and outstanding. The Company's fiscal year end is December 31.

The party responsible for the preparation of the unaudited financial statements of the Company is Erwin Vahlsing, Jr. Mr. Vahlsing provides CFO services for several publicly traded companies. He received an MBA from the University of Rhode Island and an undergraduate degree from the University of Connecticut.

The Company's Transfer Agent is:

EQ Shareowner Services
One Glenwood Ave., Suite 1001
Raleigh, NC 27603
Phone:(303) 282-4800

An inquiry to the transfer agent was the source of confirmation of the Company's shares outstanding. Additionally, a search of the SEC's EDGAR system confirmed that Transfer Online Inc. is a registered transfer agent.

Further, pursuant to an inquiry of management and directors of the corporation, to the best of this firm's knowledge, neither the Company nor any person or entity holding at least five percent (5%) of the corporation's stock is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities law.

The Company states that it is not a shell company as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Securities Exchange Act of 1934.

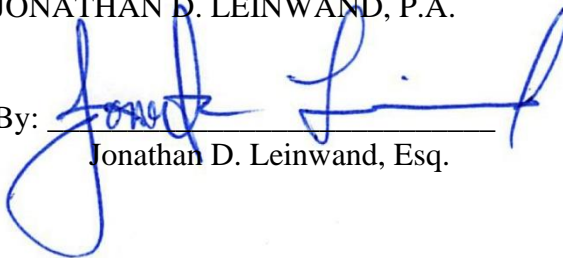
No person or entity other than OTC Markets is entitled to rely upon this opinion. OTC Markets, however, is granted full and complete permission and rights to publish this document via the OTC Disclosure and News Service for viewing by the general public and regulators. The public and OTC Markets Group may rely on the above in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933. The information that has been posted via OTC Disclosure and News Service constitutes adequate current public information, is available within the meaning of S.E.C. Rule 144(c)(2) of the Securities Act, includes all the information that a broker-dealer would be

required to obtain from an issuer in order to publish a quotation for its securities pursuant to Rule 15c2-11 under the Securities Exchange Act of 1934, and complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information.

The author of this letter has been admitted to practice in the State of Florida and is resident of the United States. The opinions expressed herein are in reference to the laws of the United States. The undersigned counsel is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice before the Commission. Counsel is not currently, nor has in the past five years, been the subject of an investigation, hearing, or proceeding by the SEC, the U.S. Commodity Futures Trading Commission (CFTC), the Financial Industry Regulatory Authority (FINRA), or any other federal, state, or foreign regulatory agency. Additionally, during the last five years counsel has not been suspended or barred from practicing in any state or jurisdiction and has not been charged in a civil or criminal case.

Counsel does not own any of the Company's securities and has no agreement to receive any of the Company's securities in the future

Very Truly Yours,
JONATHAN D. LEINWAND, P.A.

By: 
Jonathan D. Leinwand, Esq.