The Midway Law Firm APC

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December 16, 2021

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

Attorney Letter Regarding Adequate Current Information of Sky Century Investment, Inc. ("SKYI")

Dear Sir or Madam:

We have acted as special counsel to SKYI, a Nevada corporation (the "Company"), with respect to the provisions of Rule 144(c)(2) promulgated under the Securities Act of 1933, as amended (the "Securities Act"). The Company has requested that we provide this letter to you for posting on the OTC Disclosure and News Service ("OTC News Service").

In our capacity as special counsel to the Company, we have examined such corporate records and other documents of the Company, including its Articles of Incorporation, Bylaws, and certain minutes and actions of the Company's Board of Directors and its stockholders (the "Corporate Documents") and we have made such other investigations of law and facts as we have deemed necessary to enable us to make the confirmations expressed below. We have also examined the documents listed below (the "Information"):

- SKYI's Annual Report for the period ended May 31, 2021 as posted with the OTC News Service on August 26, 2021.
- SKYI's Quarterly Report for the period ended August 31, 2021, as posted with the OTC News Service on November 17, 2021.
- SKYI's Quarterly Report for the period ended February 28, 2021, as posted with the OTC News Service on May 5, 2021.
- SKYI's Quarterly Report for the period ended November 30, 2020, as posted with the OTC News Service on January 19, 2021.
- SKYI's Quarterly Report for the period ended August 31, 2020, as posted with the OTC News Service on October 15, 2020.

As to matters of fact, we have relied upon the Corporate Documents, the. Information, and such other information provided by the officers and directors of the Company and the Company's transfer agent as we deemed relevant. The undersigned counsel has also personally met with the Company's President Natalia Petranetska through video conference call. In this and other such meetings and conversations, the Information, the Corporate Documents, and other information as provided by the

Company were discussed. We have no reason to believe that such information, documents, and records from all sources as provided to us are not accurate, authentic and reliable.

The confirmations and statements expressed are limited solely to the federal law of the United States and the law of the State of Nevada.

Based upon the foregoing and subject to our stated assumptions, qualifications and limitations, we confirm that:

The financial statements of SKYI contained in the Information are unaudited and were prepared by Khamijon Alimzhanov. Mr. Alimzhanov is a capable expert in the areas of CBD and IT development.

The Issuer's transfer agent (the "Transfer Agent") is West Coast Transfer, Inc. with an address of 721 N. Vulcan Ave. Ste 205, Encinitas, CA 92024. The transfer agent is registered with the Securities and Exchange Commission. The method used by the counsel to confirm the number of outstanding shares was review of the shareholders' list generated by the Transfer Agent.

The Information (a) constitutes "adequate current public information" concerning the Company's common stock as quoted on the OTC Link (the "Securities"), and "is available" within the meaning of Rule 144(c)(2) of the Securities Act, (b) includes all the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the Securities pursuant to Rule 15c2-11 of the Securities Exchange Act of 1934, as amended, (c) complies as to form with the OTC Markets Group's OTC Risk Disclosure Guidelines for Providing Adequate Current Information, available at www.otcmarkets.com (d) has been posted through the OTC News Service.

To the best of our knowledge, after inquiry of management and the directors of the Company, we confirm that neither our firm, nor the Company, nor any 5% or more holder of the Securities is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

The confirmations and statements made in the letter are subject to the following assumptions, exceptions and qualifications:

- (a) We have assumed that (i) all information in all documents reviewed by us is true and correct, (ii) all signatures on all documents reviewed by us are genuine, (iii) all documents submitted to us as originals are true and complete, (iv) all documents submitted to us as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by us had the legal capacity to do so.
- (b) Except as specifically set forth herein, we have made no independent investigation as to the accuracy or completeness of any factual matters contained in the records, documents and certificates that we have reviewed in connection with the foregoing opinion.
- (c) We make no statement or confirmation with respect to the financial statements and schedules and other financial and accounting information and data other than the confirmations expressly set forth above, and no opinion, statement, or confirmation on any other matter may be inferred or implied from this letter.

- (d) We make no statement or confirmation as to any matter other than the confirmations expressly set forth above, and no opinion, statement, or confirmation on any other matter may be inferred or implied from this letter.
- (e) The confirmations expressed herein are given as of the date of this letter, and we disclaim any obligation to advise you of any change in any matter set forth herein.

The undersigned counsel: (a) is a resident of the United States; (b) is licensed to practice and in good standing in California; (c) is permitted to practice before the SEC; and (d) has not been prohibited from practice before the SEC.

The undersigned counsel is not currently, or 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

The undersigned counsel is not currently suspended or barred from practicing in any state or jurisdiction, and counsel has not been charged in a civil or criminal case. During the past five years, counsel was suspended from practicing law for two 30-day periods by the California bar. One 30-day period in 2019 was for non-compliance with a family court order. The other 30-day period lasted from October 16 to November 16, 2020 for non-compliance with client trust accounting under the rules of professional conduct.

The issuer, or its predecessors, is not now ever was a "shell company" as defined in Rules 405 of the Securities Act of 1933 and 12b-2 of the Exchange Act of 1934.

No person or entity other than the OTC Markets Group is entitled to rely upon this letter for any purpose. OTC Markets Group is granted permission and rights to publish this letter via the OTC News Service for viewing by the public and applicable regulators.

The undersigned counsel has not received, nor has an agreement to receive in the future any stock from the Issuer for services.

Very truly yours,

Marc Applbaum