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April 18, 2024

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

RE: Rightscorp, Inc.
Trading Symbol: RIHT

To Whom It May Concern:

OTC Markets Group, Inc. is entitled to rely on this letter in determining whether Rightscorp, Inc. ("Company") has made adequate current public information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I am a U.S. resident. The Company retained me as outside counsel to review its current information disclosures for the purpose of determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, rendering this letter, and related matters.

I do not beneficially own any shares of the Company's common stock, and I have not agreed to receive, or have an agreement to receive in the future, any shares of the Company's common stock in payment for services.

I have examined such corporate records and other documents and such questions of law as I considered necessary or appropriate for purposes of rendering the legal opinions in this letter.

I am an attorney at law, duly licensed and in good standing by the State Bar of California to practice law before all the Courts in the State of California. Additionally, I am a member of the bar and am qualified to practice before the United States District Court for the Southern District of California and the U.S. Ninth Circuit Court of Appeals. I have appeared *pro hac vice* in the U.S. District Court for the Southern District of New York. I am eligible to practice before the U.S. Securities and Exchange Commission (SEC) and have not been prohibited from doing so. In conjunction with the opinions expressed in this letter, I applied the laws of the United States of America. I am solely responsible for the investigation and opinions expressed in this letter and have not relied upon other counsel.

I have never been suspended or barred from the practice of law in any state or jurisdiction or charged in a criminal case. Further, I have not 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 over the past five years.

Regarding matters of fact concerning this letter, I have relied upon information obtained from the Company, its directors and officers, accounting personnel, its transfer agent, and other sources as I have seen fit. I believe all sources were reliable.

In connection with the preparation of this letter, I reviewed the following specific documents containing information about the issuer and the securities that are publicly traded through the OTC Disclosure & News Service. The following specific documents were posted on the OTC Disclosure & News Service:

1. Annual Report and unaudited financial statements for the year ended December 31, 2023, filed on April 1, 2024.
2. Quarterly Report and unaudited financial statements for the quarter ended September 30, 2023, filed on November 14, 2023.
3. Quarterly Report and unaudited financial statements for the quarter ended June 30, 2023, filed on August 14, 2023.
4. Quarterly report and unaudited financial statements for the quarter ended March 31, 2023, filed on May 15, 2023.
5. Annual Report and unaudited financial statements for the year ended December 31, 2022 and 2020, filed on March 28, 2023.

Rule 144(c)(2) specifies the information concerning an issuer that must be available before an issuer will be deemed to have satisfied the public information requirement of Rule 144(c)(2) (SEC Release 6099, at *8, Item 19). The "information" referred to in Rule 144(c)(2) is "the information concerning the issuer specified in paragraphs (a)(5)(i) to (xiv), inclusive, and paragraph (a)(5)(xvi) of § 240.15c2-11" under the Exchange Act.

Where an issuer chooses to satisfy the information requirements of Rule 144(c) in this way, it has a duty to assure itself that the information concerning itself is considered "publicly available" within the meaning of Rule 144(c)(2). The SEC believes that an issuer discharges this obligation by making the specified information "available on an ongoing and continuous basis (e.g. through the issuance of annual and quarterly reports) to security holders, market makers, brokers, financial statistical services, and any other interested persons" Securities Act Release No. 6099 (August 2, 1979), 1979 WL 174360, item (20), at *8.

Rule 15c2-11(a)(5) also requires information to be "reasonably current" 17 C.F.R. § 240.15c2-11(a)(5). The staff has effectuated the purpose of Rule 144(c) by reading into subparagraph (c)(2) the reasonably current requirement that appears in Rule 15c2-11(a)(5) World Wide Wealth Agencies, Incorporated, SEC No-Action Letter, 1975 WL 10592 (November 28, 1975); Evergood Products, Corporation, SEC No-Action Letter, 1977 WL 11489 (November 21, 1977); Educational Technology, Incorporated, SEC No-Action Letter, 1976 WL 11390 (May 17, 1976); Wilhite

Instruments, Incorporated, SEC No-Action Letter, 1975 WL 10582 (November 3, 1975); Lad Electro-Systems, Incorporated, SEC No-Action Letter, 1975 WL 10470 (February 25, 1975).

SEC Staff Compliance and Disclosure Interpretations: General Guidance, in Answer to Question 108.01: "The public information standard of Rule 15c2-11 relating to issuers not subject to Sections 13(a) or 15(d) is met only if the Rule 15c2-11 information is current." In some situations, the SEC staff has checked whether an issuer's information is "reasonably current" by examining the pink sheets and investments reports. See, e.g., Continental Alliance Corporation, SEC No-Action Letter, 1975 WL 10138 (May 9, 1975), where the staff noted that it had examined Standard and Poor's to determine whether the issuer's information was current.

Furthermore, staff interpretations of Rule 144(c)(2) indicate that the definition of the phrase "reasonably current" in Rule 15c2-11(g) is equally applicable to Rule 144(c)(2). Financial statements of the issuer will be deemed reasonably current under Rule 144(c)(2) where the following conditions are met: The balance sheet is as of a date less than 16 months before the publication or submission of the quotation, the statements of profit and loss and retained earnings are for the 12 months preceding the date of such balance sheet, and if such balance sheet is not as of a date less than 6 months before the publication or submission of the quotation, it shall be accompanied by additional statements of profit and loss and retained earnings for the period from the date of such balance sheet to a date less than 6 months before the publication or submission of the quotation Educational Technology, Incorporated, SEC No-Action Letter, 1976 WL 11390 (May 17, 1976); Wilhite Instruments, Incorporated, SEC No-Action Letter, 1975 WL 10582 (November 3, 1975). Other information concerning the issuer that is specified in Rule 144(c)(2), by way of Rule 15c2-11(a)(5), is reasonably current if it "is as of a date within 12 months prior to" the proposed sale under Rule 144.

The information that must be disclosed consists of:

- The exact name of the issuer and its predecessors (if any);
- The address of the principal executive offices.
- The state of incorporation.
- The exact title and class of securities.
- The par or stated value of the securities.
- The number of shares outstanding as of the end of the issuer's most recent fiscal year.
- The name and address of the issuer's transfer agent.
- The nature of the issuer's business.
- The nature of the issuer's products or services offered.
- The nature and extent of the issuer's facilities.
- The name of the issuer's Chief Executive Officer and of the members of the issuer's Board of Directors.
- The issuer's most recent balance sheet; profit and loss statement; and retained earnings statement; and,
- Similar financial information for that part of the preceding fiscal year that the issuer or its predecessor has been in existence.

After reviewing the aforementioned documents and analyzing the information contained in them against the above legal standards, I conclude:

- The Company's exact name and the names of its predecessors are disclosed in Item 1, page 6 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The Company address of its principal executive offices is disclosed on the cover page of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The Company's state of incorporation is disclosed on Item 1, page 6 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The exact title and class of securities are disclosed in Item 2, page 7 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The par or stated value of the securities is found in Item 2, page 7 the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The number of shares outstanding as of the end of the issuer's most recent fiscal year is disclosed in Item 2, page 7 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The name and address of the issuer's transfer agent are disclosed in Item 2, page 7 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The nature of the issuer's business is disclosed in Item 4, page 12 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The nature of the issuer's products or services offered is disclosed in Item 4, page 13 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The nature and extent of the issuer's facilities is disclosed on Item 4, page 13 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The name of the issuer's Chief Executive Officer and of the members of the issuer's Board of Directors is disclosed in Item 6, page 14 of the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023.
- The issuer's most recent balance sheet; profit and loss statement; and retained earnings statement is disclosed in the Company's annual report for the year ended December 31, 2023, and the quarterly reports for the periods ending September 30, 2023, June 30, 2023, and March 31, 2023; and,
- Similar financial information for that part for the preceding fiscal year that the issuer or its predecessor has been in existence as disclosed in the Company's annual report for the years ended December 31, 2022, and 2020.

It is my opinion that the foregoing (i) constitutes "adequate current public information" concerning the Securities and the issuer and "is available" within the meaning of Rule 144(c)(2) under the Securities Act; (ii) includes all 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

and Exchange Act of 1934 (the “Exchange Act”); (iii) complies as to form with the OTC Markets Group’s Pink Basic Disclosure Guidelines, which are located at www.otcm Markets.com; and, (iv) has been posted through the OTC Disclosure and News Service.

Atlas Bookkeeping, Inc. is responsible for preparing the issuer’s financial statements. The financial statements are not audited. Atlas Bookkeeping, Inc. is not staffed by any certified public accountants, and prepares compiled financial statements based on data provided by the Company and its control persons.

The issuer’s transfer agent is Issuer Direct and is registered with the SEC. On April 18, 2022, I telephonically confirmed the status, registration, and total number of outstanding securities.

On April 18, 2022, I conferred with director and principal executive officer Mr. Cecil Bond-Kyte and reviewed the information, as amended, published by the issuer through the OTC Disclosure and News Service, and also discussed and confirmed this information thoroughly with him in advance of filing with the OTC Markets.

To the best of my knowledge, and after inquiry of Mr. Cecil Bond-Kyte, neither the issuer, nor any officer or director or 5% beneficial owner of the issuer’s securities, or counsel are currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person other than OTC Markets Group, Inc. is entitled to rely upon this letter. The undersigned grants OTC Markets Group, Inc. full and complete permission and rights to publish the letter through the OTC Disclosure and News Service for public viewing.

The February 15, 2008 revisions and amendments to Rule 144 specifically provided that Rule 144 was not available to “shell companies.” Rule 144(i), (i) (ii) defines a shell company as (i) An issuer, other than a business combination related shell company, as defined in § 230.405, or an asset-backed issuer, as defined in Item 1101(b) of Regulation AB (§ 229.1101(b), that has: (A) No or nominal operations; **and** (B) either: (1) No or nominal assets; (2) Assets consisting solely of cash and cash equivalents; or (3) Assets consisting of any amount of cash and cash equivalents and nominal other assets; or (ii) An issuer that has been at any time previously an issuer described in paragraph (i)(1)(i). It is noteworthy that Rule 144(i)’s two-part test is conjunctive, that is, both items (i) and (ii) must be present to qualify as a shell company. It is my legal opinion that this test is fact-based.

To determine if the issuer is or was ever a shell company, I reviewed its informational and financial disclosures with the OTC Markets and the SEC. The issuer was incorporated in Nevada under the name Kids Only Market, Inc. on April 9, 2010. The Company filed a Form S-1 registration statement on December 30, 2010. In that filing, the Company disclosed that it was in the development stage and intended to commence operations in 2011. In its annual report on Form 10-K for the year ended December 30, 2011, the Company disclosed: “We have no revenues, have achieved losses since inception, have been issued a going concern opinion by our auditors, and rely upon the sale of our securities to fund operations. Accordingly, we will be dependent on future additional financing in order to maintain our operations.”

By the year ended December 31, 2012, the Company had changed its name to Stevia Agritech Corp. and was searching for a business combination. The Company still had no revenues and had not commenced operations. It disclosed: "We have been unable to raise additional funds to implement our business plan, and we do not believe that we currently have sufficient resources to do so without additional funding. As a result of the current difficult economic environment and our lack of funding to implement our business plan, our Board of Directors has begun to analyze strategic alternatives available to our Company to continue as a going concern."

These filings disclosed no material operations, assets, cash, or cash equivalents that could be considered material or non-nominal. No revenues from operations were reported for the noted periods. Based on these facts, my legal opinion is that the issuer was formerly a shell company, and Rule 144 is not available to it until the company complies with Rule 144(i)(2).

Sincerely yours,

Mailander Law Office, Inc.

A handwritten signature in blue ink, appearing to read "TAD MAILANDER", is written over a horizontal line.

TAD MAILANDER