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Lawyers
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September 6, 2024

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 Sky Century Investment, Inc. (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 Ending May 31, 2023, as posted with the OTC News Service on September 5, 2023.
- SKYI's Quarterly Report for the Period Ending August 31, 2023, as posted with the OTC News Service on October 23, 2023.
- SKYI's Quarterly Report for the Period Ending November 30, 2023, as posted with the OTC News Service on January 12, 2024.
- SKYI's Quarterly Report for the Period Ending February 29, 2024, as posted with the OTC News Service on April 15, 2023.
- SKYI's Annual Report for the Period Ending May 31, 2024, as posted with the OTC News Service on August 29, 2024.

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 Chief Executive Officer Nataliia Petranetska over video call multiple times. In such meetings and telephone 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 Company's financial statements have been prepared by Nataliia Petranetska. The Company's financial statements have not been audited.

Ms. Petranetska obtained a Master's Degree in Economics at Kyiv National University of Economics in 1989. From March 1998 to April 2007, she held the position of Financial Controller, where her responsibilities included overseeing and analyzing accounts payable and receivables. This entailed reconciling accounts with suppliers, monitoring shipments, and ensuring timely payments for delivered goods. Also, she prepared loan agreements and related documents for the credit committee and implemented these agreements. She managed debt-related matters, such as introducing a stop-list system, exploring debt repayment options, and monitoring existing credit lines. From April 2007 to December 2019, she served as the Chief Specialist of the Financial Control Department. In this role, her primary focus was on establishing and implementing a comprehensive control system for both internal and earmarked funds used by our organization's branches. She developed relevant regulations and necessary control procedures, actively contributed to formulating cash flow budgets for company branches, conducted analyses of plan variances, supervised budget execution, prepared reports, and scrutinized the volumes and growth rates of receivables and payables. She was also responsible for generating and analyzing management and financial statements for the organization's branches.

The Company's transfer agent is Vstock Transfer, LLC, whose address is 18 Lafayette Place, Woodmere, NY 11598, United States.

We have confirmed that the transfer agent is registered as a transfer agent with the Securities and Exchange Commission (the "SEC"). The number of outstanding shares as set forth in both the Annual Report for 2022 and the Annual Report for 2023 was confirmed by review of a certified stockholder list as provided 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 1Sc2-1 I 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.

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- (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.

Very truly yours,


Marc Applbaum