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641 LEXINGTON AVENUE

415 S MURPHY AVE SUNNYVALE CA 94086

520 BROADWAY SANTA MONICA CA 90401

293 EISENHOWER PARKWAY SUITE 135

14TH FLOOR LIVINGSTON NJ 07039 NEW YORK, NY 10022

June 20, 2025

Medtide Inc. (泰德医药(浙江)股份有限公司) 浙江省杭州市钱塘区下沙街道银海科创中心6幢501室-11

Morgan Stanley Asia Limited ("Morgan Stanley") 46/F, International Commerce Centre 1 Austin Road West Kowloon Hong Kong

CITIC Securities (Hong Kong) Limited ("CITIC") 18/F, One Pacific Place, 88 Queensway Hong Kong

CLSA Limited ("CLSA", together with Morgan Stanley, for themselves and on behalf of the underwriters to be engaged in respect of the Global Offering) 18/F, One Pacific Place, 88 Queensway Hong Kong

Re: CPC Scientific, Inc.

Ladies and Gentlemen,

We have acted as special counsel for CPC Scientific, Inc., a Delaware corporation (the "Company"), and have been requested to conduct a target review of certain specific matters relating to the Company.

We are providing this opinion letter (this "Opinion") in connection with the proposed global offering (the "Global Offering") and listing (the "Listing") of the H shares of Medtide Inc. (泰德医药(浙江)股份有限公司), a company organized under the applicable laws of the People's Republic of China (the "Issuer"), on The Stock Exchange of Hong Kong Limited. We call your attention to the fact that we have not been involved in providing legal services in connection with the Global Offering or the Listing, nor have we reviewed any of the transaction documents in connection with the Global Offering or the Listing. As such, we express no opinion to the Global Offering or the Listing or any statement made by or on behalf of the Issuer or any other person or entity with respect to the Global Offering or the Listing, except for the statements set forth in this Opinion.

In preparing this Opinion, we have examined, and our review is strictly limited to, copies of the following documents (individually, a "**Document**" and, collectively, the "**Documents**"):

- (i) The Certificate of Incorporation filed with the Secretary of State of Delaware dated April 27, 2005 (the "Filed Certificate");
 - (ii) The Bylaws of the Company, dated May 1, 2005 (the "Bylaws");
- (iii) The Statement and Designation by Foreign Corporation filed with the Secretary of State of California dated May 31, 2005 (the "CA Filed Qualification");
- (iv) The Foreign Corporation Certificate of Registration filed with the Secretary of the Commonwealth of Massachusetts dated March 7, 2014;
- (v) The Certificate of Authority filed with the Secretary of State of North Carolina dated March 25, 2021;
- (vi) The Certificate of Good Standing issued by the Secretary of State of Delaware dated June 4, 2025 (the "**DE Good Standing Certificate**");
- (vii) The Good Standing Certificate issued by the Secretary of State of California dated June 2, 2025 (the "CA Good Standing Certificate");
- (viii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the UCC lien and the federal tax lien against the Company as of May 22, 2025, if any, in the Secretary of State of the State of Delaware;
- (ix) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgment lien against the Company as of May 28, 2025, if any, in New Castle County, Delaware;
- (x) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the UCC lien, the federal tax lien, the state tax lien, and the judgement lien against the Company as of May 21, 2025, if any, in the Secretary of State of California;
- (xi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgement lien against the Company, if any, as of May 23, 2025 in the Santa Clara County, California and as of May 15, 2025 in the Placer County, California, respectively;

- (xii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the UCC lien and the state tax lien against the Company as of May 23, 2025, if any, in the Secretary of the Commonwealth of Massachusetts;
- (xiii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgement lien against the Company as of May 28, 2025, if any, in the Suffolk County, the Commonwealth of Massachusetts;
- (xiv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the UCC lien and the federal tax lien against the Company as of May 21, 2025, if any, in the Secretary of State of the State of North Carolina;
- (xv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgement lien against the Company as of May 23, 2025, if any, in the Wake County, North Carolina ((viii) to (xv) collectively, the "Company Lien Search");
- (xvi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the Superior Court of Delaware, County of New Castle and Delaware Court of Chancery, County of New Castle, respectively;
- (xvii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as a defendant in the U.S. District Court for the District of Delaware;
- (xviii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search naming the Company as defendant, in the Superior Court of California, County of Santa Clara as of May 23, 2025, and in the Superior Court of California, County of Placer as of May 23, 2025, respectively;
- (xix) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the U.S. District Court for the Northern District of California and in the U.S. District Court for the Eastern District of California, respectively;
- (xx) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the Suffolk County Superior Court, the Commonwealth of Massachusetts;
- (xxi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the U.S. District Court for the District of Massachusetts;
- (xxii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 23, 2025, naming the

Company as defendant in the Superior Court of North Carolina, County of Wake;

(xxiii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the United States District Court for the Eastern District of North Carolina ((xvi) to (xxiii) collectively, the "Company Litigation Search");

(xxiv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to any filing made by the Company as of May 28, 2025, under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the District of Delaware;

(xxv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to any filing made by the Company as of May 28, 2025 under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the Northern District of California and in the U.S. Bankruptcy Court for the Eastern District of California, respectively;

(xxvi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to any filing made by the Company as of May 28, 2025, under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the District of Massachusetts;

(xxvii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this Opinion, with respect to any filing made by the Company as of May 28, 2025 under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the Eastern District of North Carolina ((xxiv) to (xxvii) collectively, the "Company Bankruptcy Search").

With your permission, we caused the Company Litigation Search and the Company Bankruptcy Search to be conducted in the databases of the following courts ("Courts"): (i) the U.S. District Court for the District of Delaware, (ii) the Superior Court of Delaware, County of New Castle, (iii) the Delaware Court of Chancery, County of New Castle, (iv) the U.S. Bankruptcy Court for the District of Delaware, (v) the Superior Court of California, County of Santa Clara, (vi) the Superior Court of California, County of Placer, (vii) the U.S. District Court for the Northern District of California, (viii) the U.S. District Court for the Eastern District of California, (ix) the U.S. Bankruptcy Court for the Northern District of California, (x) the U.S. Bankruptcy Court for the Eastern District of California (xi) the Suffolk County Superior Court, the Commonwealth of Massachusetts, (xii) the U.S. District Court for the District of Massachusetts, (xiii) the U.S. Bankruptcy Court for the District of Massachusetts, (xiv) the Superior Court of North Carolina, County of Wake, (xv) the United States District Court for the Eastern District of North Carolina, and (xvi) the U.S. Bankruptcy Court for the Eastern District of North Carolina. We advise you that such databases do not cover any other courts besides the aforementioned Courts. We make no statement as to whether any litigation, proceeding or judgment may have been commenced or filed in any court as of the search result date of the relevant search other than the Courts mentioned above, or any other jurisdiction or the effect that any litigation, proceeding, judgment, or other matter could have on the Company, now or in the future, or its potential outcome.

With your permission, we caused the Company Lien Search to be conducted in the databases of the following governmental agencies (the "Governmental Agencies"): (i) the Secretary of State of the State of Delaware, (ii) the New Castle County, Delaware, (iii) the Secretary of State of the State of California, (iv) the Santa Clara County, California, (v) the Placer County, California, (vi) the Secretary of the Commonwealth of Massachusetts, (vii) the Suffolk County, the Commonwealth of Massachusetts, (viii) the Secretary of State of the State of North Carolina, and (ix) the Wake County, North Carolina. We advise you that such databases do not cover any other databases maintained by a governmental agency other than the aforementioned Governmental Agencies. We make no statement as to whether any lien or encumbrance may have been filed or recorded in any database maintained by a governmental agency other than the Governmental Agencies mentioned above. Additionally, we advise you that the Company Lien Search to be conducted in the databases of the Governmental Agencies only covers the liens that have been recorded with or perfected by filing with the relevant Governmental Agencies, but excludes the unfiled liens and liens without recordation (if any).

Please note that certain statements in this Opinion are solely or partly based on the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search, as applicable, in each case performed and provided by a third-party agent (the "Third Party Agents"). Such Third Party Agents provide relevant services independently, and are not affiliated with our firm in any manner. The result of the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search contain information compiled from sources which we consider reliable but do not control. The information provided in the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search is not a certified record of the applicable jurisdictions. We do not (i) warrant or guarantee the accuracy, completion or timeliness of the information provided, or (ii) accept any liability for delays, errors or omissions in the information provided or in connection with the services provided by a Third Party Agent.

In addition, we have examined an Officer Certificate issued by Xiang Li, on behalf of the Company in his or her capacity as the Chief Executive Officer of the Company, dated June 20, 2025 (the "Officer Certificate"). The copy of the Officer Certificate accompanies this Opinion. In rendering this Opinion, we have relied upon the Officer Certificate as to, among others, certain factual matters. We have assumed that each and all of the statements made in the Officer Certificate are true, accurate, complete and not misleading in any respect. We have made no independent investigation of the accuracy or completeness of such matters.

When used in this Opinion, the phrase "to our knowledge" or an equivalent phrase limits the statements it qualified to (a) the current actual knowledge of the lawyers in this firm responsible for preparing this Opinion and (b) a review of the Documents. With your permission, we have not otherwise undertaken any independent investigation to determine the existence or absence of such information, and no inference as to our knowledge of the existence or absence of such information should be drawn from our representation of the Company in connection with this Opinion.

Where statements in this Opinion concerning the Company, or an effect on the Company, are qualified by the term "material", "materially" or "material adverse effect", those statements involve judgments as to the materiality or lack of materiality of any matter to the Company's

business, assets, results of operations or financial condition that are entirely those of the Company and its officers.

In making our examination of the Documents, we have assumed that each party to a relevant agreement has the power and authority to enter into such agreement and perform all of its obligations thereunder, and has duly authorized, executed and delivered such agreement. We have also assumed that there is no extrinsic agreement or understanding among the applicable parties to an agreement that would modify or interpret the terms of such agreement or the respective rights or obligations of the parties thereunder.

The Opinion hereinafter expressed is subject to the following further qualifications and exceptions:

- (i) All documents submitted or made available to us are authentic, complete and factually accurate and all copies of the documents submitted or made available to us are true and complete copies of the originals of such documents (including all valid additions and amendments thereto) and all signatures contained in such documents are genuine;
- (ii) All agreements, instruments and documents provided to us still exist and continue unamended (whether in written form or orally or by conduct or by course of dealings) and are in full force and effect and none of them has been amended, cancelled or superseded by some other document or agreement and no provision thereof has been waived;
- (iii) All information provided to us (written or otherwise) by the representatives of the Company is true, accurate, complete and not misleading in any respect;
- (iv) We have assumed that each director and officer of the Company has acted and will act in accordance with his or her fiduciary duties in authorizing various actions of the Company, as contemplated in the Documents and taking corporate action thereunder and we express no opinion as to whether the directors and officers have complied with their fiduciary duties or the effect, if any, of any applicable laws regarding (i) the fiduciary duties of majority stockholders or (ii) the rights of minority stockholders with respect to any transactions contemplated by the Documents or the corporate or other approvals thereof;
- (v) We express no opinion or advice as to the fairness of a transaction to the Company or its stockholder(s);
- (vi) The Opinion expressed herein is based upon the laws, regulations and published judicial and administrative decisions as of the date hereof, and are subject to amendment, repeal or other modification of the applicable laws, regulations, or judicial or administrative decisions that served as the basis for our statements;
- (vii) We express no opinion as to compliance with applicable antifraud statutes, rules or regulations of applicable federal and state laws concerning the issuance or sale of securities;
 - (viii) We express no opinion as to the tax or accounting consequences of any transaction

contemplated in connection with the issuance of the Company's capital stock under applicable tax laws and regulations and under applicable accounting rules, regulations, releases, statements, interpretations or technical bulletins;

- (ix) We express no opinion with respect to or as to the effect of any United States federal or other laws, statutes, rules, or regulations, including without limitation Section 721 of the Defense Production Act of 1950, as amended (Section 721), and as implemented by Executive Order 11858, as amended, and regulations at 31 C.F.R. Part 800 and 31 C.F.R. Part 801, as amended, the Foreign Investment Risk Review Modernization Act of 2018, the Export Administration Regulations, the International Traffic in Arms Regulations, the regulations administered by the Office of Foreign Assets Control of the U.S. Treasury Department, the Foreign Corrupt Practices Act and the regulations promulgated thereunder, Secure and Trusted Communications Networks Act of 2019 and the regulations promulgated thereunder, or other laws relating to foreign investments in the United States based on the national security of the United States;
- (x) The Company is not disqualified from relying on the exemption from the registration requirements of the Securities Act of 1933 (the "Securities Act"), provided by Rule 506 thereunder by reason of the provisions of paragraphs (d) or (e) of Rule 506;
- (xi) We disclaim any statement as to any statute, rule, regulation, ordinance, order or other promulgation of any regional or local governmental body; and
- (xii) The Opinion set forth below is given only as of the date hereof and we disclaim any undertaking or obligation to advise you of any changes in law or any facts or circumstances that may hereafter occur or come to our attention that could affect this Opinion.

Additionally, the Opinion hereinafter expressed is further qualified by, and we do not examine with respect to, or as to the effect of, the following:

- (i) bankruptcy, insolvency, reorganization, moratorium, assignments for the benefit of creditors and other similar laws relating to or affecting the relief of debtors or the rights and remedies of creditors generally, including without limitation the effect of statutory or other law regarding fraudulent transfers, preferential transfers and equitable subordination;
- (ii) general principles of equity (including but not limited to judicial decisions holding that certain provisions are unenforceable when their enforcement would violate the implied covenant of good faith and fair dealing, would be commercially unreasonable or involve undue delay), whether or not such principles or decisions have been codified by statute, or that result from the exercise of the court's discretion, and the possible unavailability of specific performance, injunctive relief or other equitable remedies, regardless of whether considered in a proceeding in equity or at law;
- (iii) Section 1670.5 of the California Civil Code or any other California or United States federal law or equitable principle which provides that a court may refuse to enforce, or may limit the application of, a contract or any clause thereof that the court finds to have been unconscionable

at the time it was made, unconscionable in performance or contrary to public policy;

- (iv) any provision purporting to (i) exclude conflict of law principles under any law or (ii) select certain courts as the venue, or establish a particular jurisdiction as the forum, for the adjudication of any controversy;
- (v) provisions stating that (i) rights or remedies are not exclusive, (ii) rights or remedies may be exercised without notice, (iii) every right or remedy is cumulative and may be exercised in addition to or with any other right or remedy, (iv) the election of a particular remedy or remedies does not preclude recourse to one or more other remedies, liquidated damages are to be paid upon the breach of, or default under, any agreement, or (vi) the failure to exercise, or any delay in exercising, rights or remedies available under an agreement will not operate as a waiver of any such right or remedy;
- (vi) provisions stating that rights set forth in the agreement in which such provision appears (i) may only be waived in writing if an implied agreement by trade practice or course of conduct has given rise to a waiver or (ii) limit the effect of waivers by trade practice or course of conduct;
- (vii) any United States federal or other antitrust laws, statutes, rules or regulations, including without limitation the Hart-Scott-Rodino Antitrust Improvements Act of 1976, or other laws relating to collusive or unfair trade practices or designed to promote competition in any jurisdiction;
 - (viii) indemnification and contribution provisions;
- (ix) the internal affairs doctrine and the United States Constitution upon the applicability of Section 2115 of the California Corporations Code as described in *VantagePoint Venture Partners 1996 v. Examen, Inc.*, 871 A.2d 1108 (Del. Sup. Ct. 2005);
- (x) any provisions imposing obligations to vote the Company's capital stock in any specified manner, or any drag-along provision, or any obligation to enforce such obligations to vote or such drag-along provisions, including without limitation those provisions set forth in the applicable voting agreement due to (i) the application of equitable principles in connection with any remedy sought to enforce such provisions, irrespective of whether the remedies sought are legal or equitable in nature, and (ii) the application of general legal principles requiring that waivers of rights be knowing and intelligent, and with knowledge of consequences of the waiver;
- (xi) any provision purporting to waive rights to service of process or objections to the laying of venue or forum in connection with any litigation arising out of or pertaining to the agreement in which such provision appears;
- (xii) any provision (i) purporting to waive broadly or vaguely stated rights, unknown future defenses, rights to damages, rights to jury trials or the benefits of other statutory, regulatory or constitutional rights that cannot be waived or, if they can be waived, cannot be waived prospectively; (ii) providing powers or approval or consent rights for one or more particular

members of the Company's board of directors; or (iii) prescribing or varying rules of evidence, method or quantum of proof or other legal standards in a manner contrary to applicable statutes and rules of law;

- (xiii) laws relating to usury or permissible rates of interest or other charges for loans, forbearances or the use of money;
- (xiv) any provision concerning the obligation of the applicable company (or its underwriters or agents) to sell shares of stock to certain persons or entities in connection with a public offering; and
- (xv) Section 1717 of the California Civil Code on the mutuality of attorney's fees provisions that purport to benefit less than all the parties thereto.

Our opinions are subject to the effect of, and we express no opinion as to the application of, any applicable fraudulent conveyance, fraudulent transfer or other similar law. We express no opinion or advice as to matters governed by laws other than the Delaware General Corporations Law, the California Corporations Code, and the federal laws of the United States of America (but exclude any federal securities law), in each case without reference to the choice of law rules and in each case which are in effect on the date hereof. We express no opinion as to whether (or the extent to which) the laws of any particular jurisdiction apply, and no opinion to the extent the laws of any jurisdiction, other than those identified above, is applicable to the subject matter hereof. We express no opinion as to any statute, rule, regulation, ordinance, order or other promulgation of any regional or local governmental body. This Opinion, if any, is based upon the facts in existence and laws in effect on the date hereof, and we expressly disclaim any obligation to update our Opinion herein, regardless of whether changes in such facts or laws come to our attention after the delivery hereof.

Based upon and subject to the foregoing, as of the date hereof, we are of the opinion that:

- 1. Based solely upon the Filed Certificate, the Company was duly incorporated under the laws of the State of Delaware on April 27, 2005.
- 2. Based solely upon the DE Good Standing Certificate, as of the date of the DE Good Standing Certificate, the Company is in good standing under the laws of the State of Delaware and has a legal corporate existence in the State of Delaware.
- 3. Based solely upon the CA Filed Qualification and the CA Good Standing Certificate, as of the date of the CA Good Standing Certificate, the Company is qualified to transact business as a foreign corporation in good standing under the laws of the State of California.
- 4. Based solely upon the Officer Certificate and the Company Lien Search, as of the search result date of the relevant search, there is no federal tax lien, state tax lien or judgment lien imposed by a governmental authority on the Company.

- 5. Based solely upon the DE Good Standing Certificate, the CA Good Standing Certificate, and the Company Bankruptcy Search, as of the search result date of the relevant search, there is no entry of an order for relief under the Title 11 of the U.S. Code (Bankruptcy), commencement of dissolution, or any adjudication of liquidation, in each case with respect to the Company in the State of Delaware and the State of California, respectively.
- 6. Based solely on our examination of the Documents, to our knowledge, the Company itself is not required to obtain any approval, authorization or consent of and from, or filing with or notification to any U.S. federal authority or any authority of the State of Delaware and the State of California solely as a result of the consummation of the proposed Global Offering and the Listing of the H shares of the Issuer on The Stock Exchange of Hong Kong Limited, and the consummation of the proposed Global Offering and the Listing of the H shares of the Issuer on The Stock Exchange of Hong Kong Limited will not conflict with, or constitute a default under the Filed Certificate, the Bylaws or the Delaware General Corporation Law as it solely relates to the business of the Company.

This Opinion is limited to the matters expressly stated herein and no opinion or other statement may be inferred or implied beyond the matters expressly stated herein. The Opinion is dated as of today. It reflects facts known to us as of today or an earlier date as set forth in this Opinion. We disclaim any obligation to update it to take account of facts, matters, events or circumstances coming to our attention after this date. No reliance may be placed on any prior draft of this Opinion.

This Opinion is solely for the benefit of the Issuer, Morgan Stanley, CITIC, CLSA, and other underwriters of the Global Offering named in the underwriting agreements for the proposed Global Offering and the Listing and may not be relied on by any other person or for any purpose not specifically identified above. Each foregoing addressee may deliver a copy of this Opinion, for informational purposes only (including in case of any quotation of or reference to this Opinion), to its counsel and to such third parties as required by applicable law or regulation, or to any governmental or regulatory authority having jurisdiction over the Global Offering and the Listing or over each such addressee, or as otherwise reasonably necessary in asserting any defense to actual or threatened legal proceedings or investigations relating to the Global Offering and the Listing.

Very truly yours,

MagStone Law, LLP

MagStone LAW

WWW.MAGSTONELAW.COM

415 S MURPHY AVE SUNNYVALE CA 94086

520 BROADWAY SANTA MONICA CA 90401 293 EISENHOWER PARKWAY SUITE 135 LIVINGSTON NJ 07039 641 LEXINGTON AVENUE 14TH FLOOR NEW YORK, NY 10022

June 20, 2025

Medtide Inc. (泰德医药(浙江)股份有限公司) 浙江省杭州市钱塘区下沙街道银海科创中心6幢501室-11

Morgan Stanley Asia Limited ("Morgan Stanley") 46/F, International Commerce Centre 1 Austin Road West Kowloon Hong Kong

CITIC Securities (Hong Kong) Limited ("CITIC") 18/F, One Pacific Place, 88 Queensway Hong Kong

CLSA Limited ("CLSA", together with Morgan Stanley, for themselves and on behalf of the underwriters to be engaged in respect of the Global Offering)
18/F, One Pacific Place, 88 Queensway
Hong Kong

Re: Incalinia, Inc.

Ladies and Gentlemen,

We have acted as special counsel for Incalinia, Inc., a Delaware corporation (the "Company"), and have been requested to conduct a target review of certain specific matters relating to the Company.

We are providing this opinion letter (this "Opinion") in connection with the proposed global offering (the "Global Offering") and listing (the "Listing") of the H shares of Medtide Inc. (泰德医药(浙江)股份有限公司), a company organized under the applicable laws of the People's Republic of China (the "Issuer"), on The Stock Exchange of Hong Kong Limited. We call your attention to the fact that we have not been involved in providing legal services in connection with the Global Offering or the Listing, nor have we reviewed any of the transaction documents in connection with the Global Offering or the Listing. As such, we express no opinion

to the Global Offering or the Listing or any statement made by or on behalf of the Issuer or any other person or entity with respect to the Global Offering or the Listing, except for the statements set forth in this Opinion.

In preparing this Opinion, we have examined, and our review is strictly limited to, copies of the following documents (individually, a "**Document**" and, collectively, the "**Documents**"):

- (i) The Certificate of Incorporation filed with the Secretary of State of Delaware dated January 2, 2013;
- (ii) The Certificate of Amendment of Certificate of Incorporation filed with the Secretary of State of Delaware dated October 21, 2013 ((i) and (ii) collectively, the "Filed Certificate");
 - (iii) The Bylaws of the Company, dated January 22, 2013 (the "Bylaws");
- (iv) The Statement and Designation by Foreign Corporation filed with the Secretary of State of California dated December 20, 2018 (the "CA Filed Qualification");
- (v) The Certificate of Good Standing issued by the Secretary of State of Delaware dated June 2, 2025 (the "**DE Good Standing Certificate**");
- (vi) The Good Standing Certificate issued by the Secretary of State of California dated June 2, 2025 (the "CA Good Standing Certificate");
- (vii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the UCC lien and the federal tax lien against the Company as of May 22, 2025, if any, in the Secretary of State of the State of Delaware;
- (viii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgment lien against the Company as of May 28, 2025, if any, in New Castle County, Delaware;
- (ix) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the UCC lien, the federal tax lien, the state tax lien, and the judgement lien against the Company as of May 21, 2025, if any, in the Secretary of State of California;
- (x) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the fixture filings, the federal tax lien, the state tax lien, the county tax lien, and the judgement lien against the Company as of May 23, 2025, if any, in the Santa Clara County, California ((vii) to (x) collectively, the "Company Lien Search");
- (xi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the litigation search as of May 28, 2025, naming the

Company as defendant in the Superior Court of Delaware, County of New Castle and Delaware Court of Chancery, County of New Castle, respectively;

- (xii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the litigation search as of May 28, 2025, naming the Company as a defendant in the U.S. District Court for the District of Delaware;
- (xiii) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the litigation search as of May 23, 2025, naming the Company as defendant in the Superior Court of California, County of Santa Clara;
- (xiv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to the litigation search as of May 28, 2025, naming the Company as defendant in the U.S. District Court for the Northern District of California ((xi) to (xiv) collectively, the "Company Litigation Search");
- (xv) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to any filing made by the Company as of May 28, 2025, under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the District of Delaware; and
- (xvi) A Report issued by CT Lien Solutions dated June 2, 2025, a copy of which accompanies this report, with respect to any filing made by the Company as of May 28, 2025 under Title 11 of the United States Code (Bankruptcy) in the U.S. Bankruptcy Court for the Northern District of California ((xv) and (xvi) collectively, the "Company Bankruptcy Search").

With your permission, we caused the Company Litigation Search and the Company Bankruptcy Search to be conducted in the databases of the following courts ("Courts"): (i) the U.S. District Court for the District of Delaware, (ii) the Superior Court of Delaware, County of New Castle, (iii) the Delaware Court of Chancery, County of New Castle, (iv) the U.S. Bankruptcy Court for the District of Delaware, (v) the Superior Court of California, County of Santa Clara, (vi) the U.S. District Court for the Northern District of California. We advise you that such databases do not cover any other courts besides the aforementioned Courts. We make no statement as to whether any litigation, proceeding or judgment may have been commenced or filed in any court as of the search result date of the relevant search other than the Courts mentioned above, or any other jurisdiction or the effect that any litigation, proceeding, judgment, or other matter could have on the Company, now or in the future, or its potential outcome.

With your permission, we caused the Company Lien Search to be conducted in the databases of the following governmental agencies (the "Governmental Agencies"): (i) the Secretary of State of the State of Delaware, (ii) the New Castle County, Delaware, (iii) the Secretary of State of the State of California, and (iv) the Santa Clara County, California. We advise you that such databases do not cover any other databases maintained by a governmental agency other than the aforementioned Governmental Agencies. We make no statement as to whether any lien or encumbrance may have been filed or recorded in any database maintained by

a governmental agency other than the Governmental Agencies mentioned above. Additionally, we advise you that the Company Lien Search to be conducted in the databases of the Governmental Agencies only covers the liens that have been recorded with or perfected by filing with the relevant Governmental Agencies, but excludes the unfiled liens and liens without recordation (if any).

Please note that certain statements in this Opinion are solely or partly based on the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search, as applicable, in each case performed and provided by a third-party agent (the "Third Party Agents"). Such Third Party Agents provide relevant services independently, and are not affiliated with our firm in any manner. The result of the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search contain information compiled from sources which we consider reliable but do not control. The information provided in the Company Lien Search, the Company Litigation Search, and the Company Bankruptcy Search is not a certified record of the applicable jurisdictions. We do not (i) warrant or guarantee the accuracy, completion or timeliness of the information provided, or (ii) accept any liability for delays, errors or omissions in the information provided or in connection with the services provided by a Third Party Agent.

In addition, we have examined an Officer Certificate issued by Xiang Li, on behalf of the Company in his or her capacity as the President of the Company, dated June 20, 2025 (the "Officer Certificate"). The copy of the Officer Certificate accompanies this Opinion. In rendering this Opinion, we have relied upon the Officer Certificate as to, among others, certain factual matters. We have assumed that each and all of the statements made in the Officer Certificate are true, accurate, complete and not misleading in any respect. We have made no independent investigation of the accuracy or completeness of such matters.

When used in this Opinion, the phrase "to our knowledge" or an equivalent phrase limits the statements it qualified to (a) the current actual knowledge of the lawyers in this firm responsible for preparing this Opinion and (b) a review of the Documents. With your permission, we have not otherwise undertaken any independent investigation to determine the existence or absence of such information, and no inference as to our knowledge of the existence or absence of such information should be drawn from our representation of the Company in connection with this Opinion.

Where statements in this Opinion concerning the Company, or an effect on the Company, are qualified by the term "material", "materially" or "material adverse effect", those statements involve judgments as to the materiality or lack of materiality of any matter to the Company's business, assets, results of operations or financial condition that are entirely those of the Company and its officers.

In making our examination of the Documents, we have assumed that each party to a relevant agreement has the power and authority to enter into such agreement and perform all of its obligations thereunder, and has duly authorized, executed and delivered such agreement. We have also assumed that there is no extrinsic agreement or understanding among the applicable parties to an agreement that would modify or interpret the terms of such agreement or the respective rights or obligations of the parties thereunder.

The Opinion hereinafter expressed is subject to the following further qualifications and

exceptions:

- (i) All documents submitted or made available to us are authentic, complete and factually accurate and all copies of the documents submitted or made available to us are true and complete copies of the originals of such documents (including all valid additions and amendments thereto) and all signatures contained in such documents are genuine;
- (ii) All agreements, instruments and documents provided to us still exist and continue unamended (whether in written form or orally or by conduct or by course of dealings) and are in full force and effect and none of them has been amended, cancelled or superseded by some other document or agreement and no provision thereof has been waived;
- (iii) All information provided to us (written or otherwise) by the representatives of the Company is true, accurate, complete and not misleading in any respect;
- (iv) We have assumed that each director and officer of the Company has acted and will act in accordance with his or her fiduciary duties in authorizing various actions of the Company, as contemplated in the Documents and taking corporate action thereunder and we express no opinion as to whether the directors and officers have complied with their fiduciary duties or the effect, if any, of any applicable laws regarding (i) the fiduciary duties of majority stockholders or (ii) the rights of minority stockholders with respect to any transactions contemplated by the Documents or the corporate or other approvals thereof;
- (v) We express no opinion or advice as to the fairness of a transaction to the Company or its stockholder(s);
- (vi) The Opinion expressed herein is based upon the laws, regulations and published judicial and administrative decisions as of the date hereof, and are subject to amendment, repeal or other modification of the applicable laws, regulations, or judicial or administrative decisions that served as the basis for our statements;
- (vii) We express no opinion as to compliance with applicable antifraud statutes, rules or regulations of applicable federal and state laws concerning the issuance or sale of securities;
- (viii) We express no opinion as to the tax or accounting consequences of any transaction contemplated in connection with the issuance of the Company's capital stock under applicable tax laws and regulations and under applicable accounting rules, regulations, releases, statements, interpretations or technical bulletins;
- (ix) We express no opinion with respect to or as to the effect of any United States federal or other laws, statutes, rules, or regulations, including without limitation Section 721 of the Defense Production Act of 1950, as amended (Section 721), and as implemented by Executive Order 11858, as amended, and regulations at 31 C.F.R. Part 800 and 31 C.F.R. Part 801, as amended, the Foreign Investment Risk Review Modernization Act of 2018, the Export Administration Regulations, the International Traffic in Arms Regulations, the regulations administered by the Office of Foreign Assets Control of the U.S. Treasury Department, the Foreign

Corrupt Practices Act and the regulations promulgated thereunder, Secure and Trusted Communications Networks Act of 2019 and the regulations promulgated thereunder, or other laws relating to foreign investments in the United States based on the national security of the United States;

- (x) The Company is not disqualified from relying on the exemption from the registration requirements of the Securities Act of 1933 (the "Securities Act"), provided by Rule 506 thereunder by reason of the provisions of paragraphs (d) or (e) of Rule 506;
- (xi) We disclaim any statement as to any statute, rule, regulation, ordinance, order or other promulgation of any regional or local governmental body; and
- (xii) The Opinion set forth below is given only as of the date hereof and we disclaim any undertaking or obligation to advise you of any changes in law or any facts or circumstances that may hereafter occur or come to our attention that could affect this Opinion.

Additionally, the Opinion hereinafter expressed is further qualified by, and we do not examine with respect to, or as to the effect of, the following:

- (i) bankruptcy, insolvency, reorganization, moratorium, assignments for the benefit of creditors and other similar laws relating to or affecting the relief of debtors or the rights and remedies of creditors generally, including without limitation the effect of statutory or other law regarding fraudulent transfers, preferential transfers and equitable subordination;
- (ii) general principles of equity (including but not limited to judicial decisions holding that certain provisions are unenforceable when their enforcement would violate the implied covenant of good faith and fair dealing, would be commercially unreasonable or involve undue delay), whether or not such principles or decisions have been codified by statute, or that result from the exercise of the court's discretion, and the possible unavailability of specific performance, injunctive relief or other equitable remedies, regardless of whether considered in a proceeding in equity or at law;
- (iii) Section 1670.5 of the California Civil Code or any other California or United States federal law or equitable principle which provides that a court may refuse to enforce, or may limit the application of, a contract or any clause thereof that the court finds to have been unconscionable at the time it was made, unconscionable in performance or contrary to public policy;
- (iv) any provision purporting to (i) exclude conflict of law principles under any law or (ii) select certain courts as the venue, or establish a particular jurisdiction as the forum, for the adjudication of any controversy;
- (v) provisions stating that (i) rights or remedies are not exclusive, (ii) rights or remedies may be exercised without notice, (iii) every right or remedy is cumulative and may be exercised in addition to or with any other right or remedy, (iv) the election of a particular remedy or remedies does not preclude recourse to one or more other remedies, liquidated damages are to be paid upon the breach of, or default under, any agreement, or (vi) the failure to exercise, or any delay in

exercising, rights or remedies available under an agreement will not operate as a waiver of any such right or remedy;

- (vi) provisions stating that rights set forth in the agreement in which such provision appears (i) may only be waived in writing if an implied agreement by trade practice or course of conduct has given rise to a waiver or (ii) limit the effect of waivers by trade practice or course of conduct;
- (vii) any United States federal or other antitrust laws, statutes, rules or regulations, including without limitation the Hart-Scott-Rodino Antitrust Improvements Act of 1976, or other laws relating to collusive or unfair trade practices or designed to promote competition in any jurisdiction;
 - (viii) indemnification and contribution provisions;
- (ix) the internal affairs doctrine and the United States Constitution upon the applicability of Section 2115 of the California Corporations Code as described in *VantagePoint Venture Partners 1996 v. Examen, Inc.*, 871 A.2d 1108 (Del. Sup. Ct. 2005);
- (x) any provisions imposing obligations to vote the Company's capital stock in any specified manner, or any drag-along provision, or any obligation to enforce such obligations to vote or such drag-along provisions, including without limitation those provisions set forth in the applicable voting agreement due to (i) the application of equitable principles in connection with any remedy sought to enforce such provisions, irrespective of whether the remedies sought are legal or equitable in nature, and (ii) the application of general legal principles requiring that waivers of rights be knowing and intelligent, and with knowledge of consequences of the waiver;
- (xi) any provision purporting to waive rights to service of process or objections to the laying of venue or forum in connection with any litigation arising out of or pertaining to the agreement in which such provision appears;
- (xii) any provision (i) purporting to waive broadly or vaguely stated rights, unknown future defenses, rights to damages, rights to jury trials or the benefits of other statutory, regulatory or constitutional rights that cannot be waived or, if they can be waived, cannot be waived prospectively; (ii) providing powers or approval or consent rights for one or more particular members of the Company's board of directors; or (iii) prescribing or varying rules of evidence, method or quantum of proof or other legal standards in a manner contrary to applicable statutes and rules of law;
- (xiii) laws relating to usury or permissible rates of interest or other charges for loans, forbearances or the use of money;
- (xiv) any provision concerning the obligation of the applicable company (or its underwriters or agents) to sell shares of stock to certain persons or entities in connection with a public offering; and

(xv) Section 1717 of the California Civil Code on the mutuality of attorney's fees provisions that purport to benefit less than all the parties thereto.

Our opinions are subject to the effect of, and we express no opinion as to the application of, any applicable fraudulent conveyance, fraudulent transfer or other similar law. We express no opinion or advice as to matters governed by laws other than the Delaware General Corporations Law, the California Corporations Code, and the federal laws of the United States of America (but exclude any federal securities law), in each case without reference to the choice of law rules and in each case which are in effect on the date hereof. We express no opinion as to whether (or the extent to which) the laws of any particular jurisdiction apply, and no opinion to the extent the laws of any jurisdiction, other than those identified above, is applicable to the subject matter hereof. We express no opinion as to any statute, rule, regulation, ordinance, order or other promulgation of any regional or local governmental body. This Opinion, if any, is based upon the facts in existence and laws in effect on the date hereof, and we expressly disclaim any obligation to update our Opinion herein, regardless of whether changes in such facts or laws come to our attention after the delivery hereof.

Based upon and subject to the foregoing, as of the date hereof, we are of the opinion that:

- 1. Based solely upon the Filed Certificate, the Company was duly incorporated under the laws of the State of Delaware on January 2, 2013.
- 2. Based solely upon the DE Good Standing Certificate, as of the date of the DE Good Standing Certificate, the Company is in good standing under the laws of the State of Delaware and has a legal corporate existence in the State of Delaware.
- 3. Based solely upon the CA Filed Qualification and the CA Good Standing Certificate, as of the date of the CA Good Standing Certificate, the Company is qualified to transact business as a foreign corporation in good standing under the laws of the State of California.
- 4. Based solely upon the Officer Certificate and the Company Lien Search, as of the search result date of the relevant search, there is no federal tax lien, state tax lien or judgment lien imposed by a governmental authority on the Company.
- 5. Based solely upon the DE Good Standing Certificate, the CA Good Standing Certificate, and the Company Bankruptcy Search, as of the search result date of the relevant search, there is no entry of an order for relief under the Title 11 of the U.S. Code (Bankruptcy), commencement of dissolution, or any adjudication of liquidation, in each case with respect to the Company in the State of Delaware and the State of California, respectively.
- 6. Based solely on our examination of the Documents, to our knowledge, the Company itself is not required to obtain any approval, authorization or consent of and from, or filing with or notification to any U.S. federal authority or any authority of the State of Delaware and the State of California solely as a result of the consummation of the proposed Global Offering and the Listing of the H shares of the Issuer on The Stock Exchange of Hong Kong Limited, and the consummation of the proposed Global Offering and the Listing of the H shares of the Issuer on The Stock

Exchange of Hong Kong Limited will not conflict with, or constitute a default under the Filed Certificate, the Bylaws or the Delaware General Corporation Law as it solely relates to the business of the Company.

This Opinion is limited to the matters expressly stated herein and no opinion or other statement may be inferred or implied beyond the matters expressly stated herein. The Opinion is dated as of today. It reflects facts known to us as of today or an earlier date as set forth in this Opinion. We disclaim any obligation to update it to take account of facts, matters, events or circumstances coming to our attention after this date. No reliance may be placed on any prior draft of this Opinion.

This Opinion is solely for the benefit of the Issuer, Morgan Stanley, CITIC, CLSA, and other underwriters of the Global Offering named in the underwriting agreements for the proposed Global Offering and the Listing and may not be relied on by any other person or for any purpose not specifically identified above. Each foregoing addressee may deliver a copy of this Opinion, for informational purposes only (including in case of any quotation of or reference to this Opinion), to its counsel and to such third parties as required by applicable law or regulation, or to any governmental or regulatory authority having jurisdiction over the Global Offering and the Listing or over each such addressee, or as otherwise reasonably necessary in asserting any defense to actual or threatened legal proceedings or investigations relating to the Global Offering and the Listing.

Very truly yours,

MagStone Law, LLP