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December 13, 2022

CANADIAN SECURITIES EXCHANGE

Suite 7210 - 100 King St. W.

Toronto, Ontario M5X 1E1

Dear Sirs:

**Re: ACME Lithium Inc. (the "Company")
Legal Opinion – Issuance of Securities – Option Agreement**

We are legal counsel for the Company. This letter is written in connection with the Company's issuance of 100,000 common shares in the capital of the Company ("Shares") at the deemed price of \$0.44 per Share pursuant to a Mineral Property Option Agreement dated December 6, 2022, as the initial tranche of shares issuable thereunder toward the option price.

We hereby confirm that the Shares have been duly and validly allotted and issued as fully paid and non-assessable common shares in the capital of the Company.

We are solicitors qualified to carry on the practice of law in the Province of British Columbia only and we express no opinion as to any laws or matters governed by any laws other than the laws of British Columbia and the federal laws of Canada applicable therein.

This opinion relates exclusively to the issuance of the securities referred to above, and is for the sole use and benefit of the addressee. Accordingly, this opinion may not be relied upon, by any other person or used in connection with any other transaction without our prior written consent. This opinion is limited to the matters stated herein, and no opinion or belief is implied or may be inferred beyond the matters expressly stated herein.

Yours truly,

OWEN BIRD LAW CORPORATION

Jeffrey B. Lightfoot