

[Date]

[Client Name]

[Client Address]

[City, State, Zip Code]

Re: Opinion Letter for the Restatement and Amendment of [Name of Retirement Plan]

Dear [Client Contact Name],

We have acted as counsel for [Company Name] (the "Employer") in connection with the restatement and amendment of the [Name of Plan] (the "Plan"), effective as of [Effective Date].

In our capacity as counsel, we have reviewed the following documents:

- The original Plan Document and all subsequent amendments;
- The newly restated Plan Document dated [Date];
- The Adoption Agreement signed [Date] (if applicable);
- The Internal Revenue Service (IRS) Opinion or Advisory Letter issued to the prototype/volume submitter sponsor (if applicable).

Based upon our review of these documents and our understanding of the current requirements of the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974 (ERISA), it is our opinion that:

1. The Plan, as restated, complies in form with the applicable requirements for tax-qualification under Section 401(a) of the Internal Revenue Code.
2. The amendments incorporated into the restatement properly reflect mandatory legislative updates required under [Reference specific acts, e.g., SECURE Act / CARES Act].
3. The Plan is designed to meet the requirements for a tax-exempt trust under Section 501(a) of the Code.

This opinion is limited to the form of the Plan document and does not address the operational compliance of the Plan in practice. This letter is intended solely for the benefit of the Employer and may not be relied upon by any other party without our express written consent.

Please retain this letter in your permanent records as evidence of the Plan's legal compliance review.

Sincerely,

[Signature]

[Name of Attorney/Partner]

[Law Firm Name]