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May 15, 2026

Low-Income Housing Tax Credit Program
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, South Carolina 29210

RE: Manning Gardens
214 Alfred Henry St
Manning, South Carolina 29102
OAHS Manning TC, LLC

Ladies and Gentlemen:

This opinion is rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program.

The undersigned firm employs attorneys-at-law, licensed to practice before the highest court in the State of South Carolina. A portion of the firm's practice relates to tax matters and the interpretation of the Internal Revenue Code of 1986 (the "Code"), as amended. We are familiar with the provisions of Section 42 of the Code, as amended, and have advised the owner with regard to its applicability to the above-referenced development.

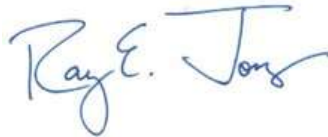
We have advised our client that beginning in 1990, Low-Income Housing Tax Credits may not be allocated solely on the basis of the acquisition of a building containing low-income units. We have advised our client that, in order to qualify, an acquired building must undergo rehabilitation. We have further advised our client as to the degree of rehabilitation which must be carried out in order for this development to qualify for the acquisition and rehabilitation credit.

We have made an independent inquiry as to the facts and circumstances surrounding the acquisition of this development by our client. We have reviewed and signed the above captioned development application dated May 15, 2026.

Based upon the foregoing, we are of the opinion that the acquisition of the above-referenced development by our client meets the requirements of Section 42 of the Code, as amended. We are further of the opinion that, should the proposed rehabilitation of this development take place in the manner contemplated by our client, said development will qualify for an allocation of the Low-Income Housing Tax Credit.

It is intended that the South Carolina State Housing Finance and Development Authority may rely on this opinion in making its determination whether or not to make an allocation of the Low-Income Housing Tax Credit to this development. This opinion may not be used or relied upon by any other person or for any other purpose without our prior written consent in each instance. Our opinion expressed herein is as of the date hereof, and we undertake no obligation to advise of any changes of applicable law or any other matters that may come to our attention after the date hereof that may affect our opinion expressed herein.

Very truly yours,

A handwritten signature in blue ink that reads "Ray E. Jones". The signature is written in a cursive, flowing style.

PARKER POE ADAMS & BERNSTEIN LLP