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December 3, 2018 (the "Second Amendment to CCA"), which amends certain provisions of the Original Continuing Covenant Agreement.

For the purposes of providing the opinions hereinafter expressed, we have reviewed (1) the Original Indenture; (2) the First Supplemental Indenture; (3) the Original Continuing Covenant Agreement; (4) the Second Amendment to CCA; (5) the Purchaser Consent; and (6) the Certificate of Municipal Advisor delivered by Susquehanna Group Advisors, Inc. and dated the date hereof. Terms used in this opinion that are not otherwise defined herein but that are defined in the Original Indenture shall have the meanings given such terms in the Original Indenture, unless the context in which they are used herein clearly requires otherwise.

Based on our review of the foregoing and our review of the Internal Revenue Code of 1986, as amended, and the relevant rules, regulations, rulings, procedures and guidance issued pursuant thereto (the "Code"), and subject to the qualifications, limitations and exceptions described herein, we are of the opinion, as of the date hereof, that the execution and delivery of the First Supplemental Indenture (a) is permitted by the Original Indenture and the Act and (b) will not, in and of itself, adversely affect the exclusion of the interest payable on the Bonds from the gross income of the Owners of the Bonds for purposes of federal income taxation pursuant to Section 103 of the Internal Revenue Code of 1986, as amended.

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In connection with providing the foregoing opinion, we call to your attention that:

A. Without independent investigation or verification on our part, we have relied upon and assumed the following: (i) the authenticity of all documents, agreements and certificates reviewed by us purporting to be originals, executed counterparts or photocopies thereof, (ii) the conformity to original documents, agreements and certificates of all copies reviewed by us, (iii) the genuineness of all signatures, (iv) the accuracy, truthfulness and completeness of all documents, agreements and certificates as to the statements of fact therein contained reviewed by us and underlying the legal conclusions set forth herein, and (v) that the interest on the Bonds remains to date, excludable from gross income for purposes of federal income taxation without regard to the execution and delivery of the First Supplemental Indenture. We have also assumed the legal capacity, authority and due and proper execution and delivery by the respective parties, that have made, executed or delivered, or will make, execute and deliver, the agreements, documents, certificates and opinions examined by us or upon which our assumptions and reliance are based.

B. We do not express any opinion herein, have undertaken no investigation of, or made any inquiry with respect to, compliance by any party with any requirements which were required to have been met on or after the date of original issuance of the Bonds to assure that interest thereon is not and does not, become includable in gross income for federal income

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tax purposes. We express no opinion as to whether interest on the Bonds has been, is now or will be excludable from gross income for purposes of federal or state income taxation. Our opinion is confined solely to the effect of the execution and delivery of the First Supplemental Indenture, as expressed above.

C. In providing the opinion expressed herein, we have not passed upon, have not independently verified, and do not assume any responsibility for, but rather have assumed the continuing correctness of, the opinions of Bond Counsel delivered in connection with the original issuance of the Bonds.

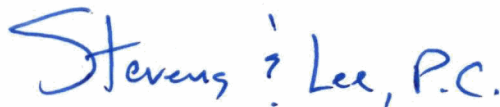
D. We express no opinion regarding other federal income tax consequences arising with respect to the Bonds and the effects, if any, of other provisions of the Code, which could result in collateral federal income tax consequences to certain holders of tax-exempt obligations as a result of adjustments in the computation of tax liability which are dependent on the interest on the Bonds being excludable from gross income for federal income tax purposes.

E. We assume no obligation to update or supplement our opinions contained herein to reflect any facts or circumstances that may hereafter come to our attention or any changes in laws that may hereafter occur.

F. The opinions expressed herein are based upon our interpretation of, and are limited to, existing laws. It should be noted that we express no opinion as to: (i) the laws of any state or jurisdiction other than the Commonwealth of Pennsylvania, (ii) the laws of the United States, except as expressly indicated, and (iii) any matters pertaining or relating to federal securities laws or regulatory matters or the securities laws of the Commonwealth of Pennsylvania or any other state.

G. This opinion letter is provided solely for your benefit. No one else shall be entitled to rely on or to communicate this opinion letter in any way without the express written consent of the undersigned. This opinion letter speaks as of the date hereof and we assume no obligation to update or supplement our opinions contained herein to reflect any facts or circumstances that may hereafter come to our attention or any changes in laws that may hereafter occur.

STEVENS & LEE, P.C.

Handwritten signature in blue ink that reads "Stevens & Lee, P.C." with a stylized flourish.