

December 24, 2020

Reply to: Stewart L. Muglich  
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Matter No.: 1146017

British Columbia Securities Commission  
Alberta Securities Commission  
Ontario Securities Commission

Attention: SEDAR Filing

Dear Sirs/Mesdames:

**Re: Filing of Preliminary Short Form Prospectus for BetterLife Pharma Inc. -  
SEDAR Project #3155110**

Further to the filing preliminary short form prospectus, we request that you add the Alberta Securities Commission as a recipient agency to SEDAR Project #3155110 for each of the documents noted below:

- the annual information form of the Company for the financial year ended January 31, 2020 dated June 5, 2020 and filed on October 15, 2020 (the “**Annual Information Form**”);
- the audited consolidated financial statements of the Company, for the years ended January 31, 2020 and 2019, together with the auditors’ report thereon and the notes thereto (the “**Annual Financial Statements**”);
- the management’s discussion and analysis of financial condition and results of operations of the Company for the year ended January 31, 2020 (the “**Annual MD&A**”);
- the condensed interim consolidated financial statements of the Company for the three and nine months ended October 31, 2020 and October 31, 2019, and the notes thereto, except the notice provided under subparagraph 4.3(3)(a) of National Instrument 52-102 – *Continuous Disclosure Obligations* (“**NI 51-102**”) (the “**Interim Financial Statements**”);
- the management’s discussion and analysis of financial condition and results of operations of the Company for the nine months ended October 31, 2020 and October 31, 2019 (the “**Interim MD&A**”);
- the management information circular of the Company dated November 20, 2020 distributed in connection with the Company’s annual general meeting of shareholders [**to be**] held on December 14, 2020;
- the filing statement of the Company filed on August 31, 2020;
- the material change report dated April 7, 2020 announcing the granting of options, the termination of three positions and the settlement of litigation;
- the material change report dated May 13, 2020 announcing the entering into of a licensing agreement with Altum Pharmaceuticals Inc., a change in the board, a warrant repricing and the grant of options;

- the material change report dated May 26, 2020 announcing an option grant and the entering into of lock-up agreements for a potential business combination with Altum Pharmaceuticals Inc.;
- the material change report dated June 9, 2020 announcing a change of the OTC ticker symbol, from "PVOTF" to "BETRF";
- the material change report dated June 15, 2020 announcing the Company entered into an exclusivity agreement with Altum Pharmaceuticals Inc. to work towards finalizing a mutually acceptable definitive agreement for the business combination transaction;
- the material change report dated June 29, 2020 announcing a share consolidation on a ten for one basis;
- the material change report dated July 30, 2020 announcing the receipt of shareholder approval from the shareholders of Altum Pharmaceuticals Inc. for the business combination with the Company;
- the material change report dated August 11, 2020 announcing the closing of a non-brokered private placement for gross proceeds of \$1,361.777;
- the material change report dated September 9, 2020 announcing the closing of the business combination with Altum Pharmaceuticals Inc.;
- the material change report dated October 8, 2020 announcing the sale of Pivot Pharmaceuticals Manufacturing Inc. and the entering into of an agreement for the production of interferon alpha 2b;
- the material change report dated October 19, 2020 announcing the entry into of an engagement letter with the Agents;
- the material change report dated December 2, 2020 announcing the closing of the Offering;
- the material change report dated December 8, 2020 announcing the proposed acquisition of patents from Nutraneeds LLC; and
- the material change report dated December 21, 2020 announcing the closing of the acquisition of patents from Nutraneeds LLC.

Thank you for your attention to this matter.

Yours truly,

**ALEXANDER HOLBURN BEAUDIN + LANG LLP**

Per:

*"Stewart L. Muglich"*

Stewart L. Muglich  
Partner  
SLM