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APTORUM GROUP LIMITED

17th Floor, Guangdong Investment Tower 148 Connaught Road Central Hong Kong

September 29, 2020

VIA EDGAR

U.S. Securities and Exchange Commission Division of Corporation Finance Office of Life Science 100 F Street, N.E. Mail Stop 4631 Washington, DC 20549

> Re: Aptorum Group Limited Registration Statement on Form F-1 Filed September 11, 2020 File No. 333-248743

Dear Sir and Madam:

Earlier today, September 29, 2020, Aptorum Group Limited requested acceleration of the effective date of the above referenced Registration Statement so that it would become effective at noon today, Tuesday, September 29, 2020, or as soon as thereafter practicable. We hereby withdraw our request until further notice.

We thank the Staff for your review of the foregoing. If you have any further concerns, we ask that you forward them by electronic mail to our counsel, Louis Taubman at https://linear.com or by telephone at (917) 512-0827.

/s/ Ian Huen Ian Huen CEO

cc: Louis Taubman

Hunter Taubman Fischer& Li LLC