

**APTORUM GROUP LIMITED**  
17<sup>th</sup> 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 Ltd**  
**Registration Statement on Form F-1**  
**Filed September 11, 2020**  
**File No. 333-248743**

Dear Sir and Madam:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Aptorum Group Limited hereby respectfully requests acceleration of effectiveness of the above referenced Registration Statement so that it will become effective at 12:00 p.m. Eastern Time on Tuesday, September 29, 2020, or as soon as thereafter practicable.

Please note that we acknowledge the following:

- should the Securities and Exchange Commission (the “Commission”) or the staff (the “Staff”), acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the Staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert Staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

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 [ltaubman@htflawyers.com](mailto:ltaubman@htflawyers.com) or by telephone at (917) 512-0827.

/s/ Ian Huen

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Ian Huen  
CEO

cc: Louis Taubman  
Hunter Taubman Fischer & Li LLC

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