

**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 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 [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