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PARADIGM MEDICAL INDUSTRIES INC  
Form AW  
June 27, 2005

[Paradigm Medical Industries, Inc. Letterhead]

June 24, 2005

VIA FACSIMILE  
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Securities and Exchange Commission  
Division of Corporation Finance  
450 Fifth Street, N.W., Mail Stop 0306  
Judiciary Plaza  
Washington, D.C. 20549

Attn: Thomas A. Jones, Esq.  
Senior Attorney

Re: Paradigm Medical Industries, Inc.  
Application for Withdrawal of Post-Effective Amendment No. 2 to  
Registration Statement on Form SB-2  
Commission File No. 333-103061

Ladies and Gentlemen:

Paradigm Medical Industries, Inc., a Delaware corporation (the "Registrant"), hereby requests pursuant to Rule 477(a) of the Securities Act of 1933, as amended, the Securities and Exchange Commission (the "Commission") consent to the withdrawal of the Registrant's Post-Effective Amendment No. 2 to the Registration Statement No. 333-1030651, which was previously filed with the Commission on February 3, 2005, on Form SB-2, together with any exhibits filed thereto.

The Amendment No. 2 was filed as a post-effective amendment to the Registration Statement to register for resale shares of Registrant's common stock for certain shareholders, optionholders and warrant holders. In order to reflect and disclose material changes in Company's operations since February 3, 2005, Registrant filed Post-Effective Amendment No. 3 to the Registration Statement on Form SB-2 on June 24, 2005.

Because Post-Effective Amendment No. 2 to the Registration Statement is no longer current, and has been superceded by Post-Effective Amendment No. 3, Registrant requests for the withdrawal of Post-Effective Amendment No. 2. No securities of Registrant have been sold in connection with the filing of Post-Effective Amendment No. 2 to the Registration Statement.

Please direct any questions or comments regarding this filing to the undersigned at (801) 977-8970 or Randall A. Mackey, Esq. at (801) 575-5000.

PARADIGM MEDICAL INDUSTRIES, INC.

By: /s/ John Y. Yoon  
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John Y. Yoon  
President and Chief Executive Officer