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BIOENVISION INC Form AW January 06, 2005

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VIA EDGAR AND FACSIMILE

U.S. Securities and Exchange Commission 450 Fifth Street, N.W. Washington, D.C. 20549

Withdrawal of S-8 POS (Accession No. 0001116679-05-000069)

Bioenvision, Inc., CIK No.: 0001028205 Securities Act File No.: 333-113094

Ladies and Gentlemen:

On January 6, 2005 we filed Post-Effective Amendment No. 1 to Form S-8 Registration Statement (the "Filing"). The word "Independent" was mistakenly omitted before "Registered Public Accounting Firm" in the description of Exhibit No. 23.1 under Item 8 and the Index to Exhibits. Accordingly, we request the withdrawal of the Filing.

Please forward a copy of the Commission's order granting the withdrawal via facsimile, to my attention at (212)319-4090. Please direct any questions you may have with respect to this application to me at (212)318-6739. Thank you for your assistance in this matter.

Very truly yours,

/s/ Amy Rosenberg Amy Rosenberg for Paul, Hastings, Janofsky & Walker LLP