

**GT Biopharma, Inc.**  
**8000 Marina Blvd, Suite 100**  
**Brisbane, CA 94005**

June 27, 2024

**Via EDGAR Submission**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Energy & Transportation  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Tim Buchmiller

**Re: GT Biopharma, Inc.**  
**Registration Statement on Form S-1**  
**File No. 333-280326**  
**CIK: 109657**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended (the "Act"), GT Biopharma, Inc., a Delaware corporation (the "Company"), respectfully requests that the effective date of the registration statement on Form S-1 (File No. 333-280326), initially filed with the U.S. Securities and Exchange Commission on June 20, 2024 (the "Registration Statement"), be accelerated so that it will become effective at 5:30 p.m., Eastern Time, on 28 June, 2024, or as soon as practicable thereafter. In making this acceleration request, the Company acknowledges that it is aware of its obligations under the Act.

If you have any questions or comments, please contact Roger Bivans of Baker & McKenzie LLP at (214) 978 3095.

Thank you for your assistance with this matter.

Sincerely,

/s/ Michael Breen

Michael Breen  
Interim Chief Executive Officer

Via E-mail:

cc: Roger Bivans  
*Baker & McKenzie LLP*

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