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PARADIGM MEDICAL INDUSTRIES INC  
Form AW  
January 11, 2005

PARADIGM MEDICAL INDUSTRIES, INC.  
2355 South 1070 West  
Salt Lake City, Utah 84119  
(801) 977-8970

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VIA EDGAR  
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Securities and Exchange Commission  
450 Fifth Street, N.W.  
Judicial Plaza  
Washington, D.C. 20549

Attn: Thomas A. Jones  
Senior Attorney

Re: Paradigm Medical Industries, Inc.  
Application for Withdrawal of 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, that the Securities and Exchange Commission (the "Commission") consent to the withdrawal of the Registrant's Amendment No. 1 to the Registration Statement No. 333-103061, which was filed with the Commission on December 22, 2004, on Form SB-2, together with any exhibits filed thereto (the "Amendment").

The Amendment was filed as a pre-effective rather than 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. For this reason, Registrant requests for the withdrawal of the Amendment. No securities of Registrant have been sold in connection with the filing of the Amendment. Registrant intends to amend the Registration Statement by filing a post-effective amendment on Form SB-2.

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

