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**Tonix Pharmaceuticals Holding Corp.**  
**26 Main Street, Suite 101**  
**Chatham, New Jersey 07928**

September 3, 2025

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

**Re: Tonix Pharmaceuticals Holding Corp.**

**Registration Statement on Form S-3 (File No. 333-287965)**

**Filed on June 12, 2025**

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, Tonix Pharmaceuticals Holding Corp. hereby requests that the above-referenced Registration Statement (the "Registration Statement") be declared effective by the Securities and Exchange Commission at 4:30 p.m., Eastern Time, on September 4, 2025, or as soon as practicable thereafter.

Please call Irina Ishak of Lowenstein Sandler LLP at (973) 422-6406 to confirm the effectiveness of the Registration Statement or with any questions.

Very truly yours,

TONIX PHARMACEUTICALS HOLDINGS CORP.

By: /s/ Bradley Saenger

Name: Bradley Saenger

Title: Chief Financial Officer

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