

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

August 12, 2013

<u>Via E-mail</u> Jason A. Zellers, Esq. Vice President, General Counsel and Secretary St. Jude Medical, Inc. One St. Jude Medical Drive St. Paul, Minnesota 55117

> Re: St. Jude Medical, Inc. Form 10-K for the fiscal year ended December 29, 2012 Filed February 26, 2013 Form 8-K Filed October 24, 2012 File No. 001-12441

Dear Mr. Zellers:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Amanda Ravitz

Amanda Ravitz Assistant Director