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November 8, 2006

VIA EDGAR AND FACSIMILE (202)772-9202

Mr. John Reynolds
Assistant Director
Securities and Exchange Commission
Division of Corporation Finance
Office of Emerging Growth Companies
Mail Stop 3561
100 F Street, N.E.
Washington, D.C. 20549

**Re: Familymeds Group, Inc.
Registration Statement on Form S-3
File No. 333-136858**

Dear Mr. Reynolds:

On behalf of Familymeds Group, Inc., we hereby request effectiveness of the above-referenced Registration Statement, effective as of 5:00, today, November 8, 2006, or as soon thereafter as is practicable. In connection therewith, we hereby acknowledge, on behalf of our client, that:

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert this action as a defense in any proceeding initiated by the Commission or any person under the federal securities Laws of the United States.

Mr. John Reynolds
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Thank you in advance for your attention and cooperation with this matter. Should you have any questions or need additional information, please do not hesitate to contact me at (813) 227-2325.

Sincerely,



Handwritten signature of Julio C. Esquivel, consisting of a stylized, cursive script.

Julio C. Esquivel

cc: Allison Kiene