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William Slattery, CFA  
Vice President  
Listing Qualifications

Received SEC

SEP 20 2017

Washington, DC 20549

CERT NAS

File No. 001-38201

Electronic Mail Only

September 20th, 2017

Mr. Jeffrey Thomas  
Chief, IT Services  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Dear Mr. Thomas:

This is to certify that on September 11<sup>th</sup>, 2017 The Nasdaq Stock Market (the "Exchange") received from **SECOO Holding Limited** (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b) for the registration of the following securities:

American depositary shares, two  
representing one ordinary share

Ordinary shares, par value US\$ 0.001 per share

We further certify that the securities described above have been approved by the Exchange for listing and registration upon official notice of issuance.

We understand that the Registrant is seeking effectiveness of the Form 8-A 12(b) concurrently with effectiveness of its 1933 Act Registration Statement, and we hereby join in such request.

Sincerely,

*William Slattery*