

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
January 19, 2018**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**Avadel Pharmaceuticals plc  
File No. 001-37977 - CF#35736**

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Avadel Pharmaceuticals plc submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on November 9, 2017, as amended on November 17, 2017.

Based on representations by Avadel Pharmaceuticals plc that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibits will not be released to the public for the time periods specified:

Exhibit 10.6	through November 9, 2027
Exhibit 10.7	through November 9, 2027
Exhibit 10.8A	through November 9, 2027

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields  
Secretary