

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

**16 April 2009**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES ACT OF 1933**

**Achillion Pharmaceuticals Inc.**

**File No. 333-132921 - CF# 23342**

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Achillion Pharmaceuticals, Inc. submitted an application under Rule 406 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibits to a Form S-1 registration statement filed on March 31, 2006.

Based on representations by Achillion Pharmaceuticals, Inc. 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 exhibit(s) will not be released to the public for the time period(s) specified:

|              |                        |
|--------------|------------------------|
| Exhibit 10.1 | through March 31, 2012 |
| Exhibit 10.2 | through March 31, 2012 |
| Exhibit 10.3 | through March 31, 2012 |

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

Timothy S. Levenberg  
Special Counsel