

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

March 2, 2020

Winston L. Black Chief Executive Officer SWK Holdings Corporation 14755 Preston Road, Suite 105 Dallas, TX 75254

Re: SWK Holdings Corporation

Form 10-Q

Exhibit No. 10.1 Non-Exclusive License Agreement between

Enteris BioPharma, Inc. and Cara Therapeutics, Inc. dated as of August 20, 2019

Filed November 14, 2019

File No. 000-27163

Mr. Black:

We have concluded our assessment of your redacted exhibit for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance