



DIVISION OF  
CORPORATION FINANCE

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

December 13, 2011

Via Email

Nancy A. Gray  
Chief Financial Officer  
Pacific Mercantile Bancorp  
949 South Coast Drive, Suite 300  
Costa Mesa, CA 92626

**Re: Pacific Mercantile Bancorp  
Preliminary Proxy Statement on Schedule 14A  
Filed December 2, 2011  
File No. 000-30777**

Dear Ms. Gray:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Christian Windsor

Christian Windsor  
Special Counsel

cc: Ben A. Frydman  
*Straddling Yocca Carlson & Rauth*