

**Mail Stop 4561**

March 11, 2009

Luis A. Rivera  
Chief Executive Officer  
Lyris, Inc.  
103 Foulk Road, Suite 205Q  
Wilmington, DE 19803

**Re: Lyris, Inc.  
Revised Preliminary Proxy Statement on Schedule 14A  
Filed March 10, 2009  
File No. 333-82154**

Dear Mr. Rivera:

We have completed our review of your revised filing and response letter, and have no further comments at this time.

Sincerely,

David L. Orlic  
Special Counsel

cc: Via Facsimile (510) 277-0652  
Heidi L. Mackintosh, Secretary  
Telephone: (510) 844-2178