UNITED STATES SECURITIES AND EXCHANGE COMMISSION December 19, 2018

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Athenex, Inc.

File No. 1-38112 - CF#37011

Athenex, Inc. 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 14, 2018.

Based on representations by Athenex, 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 10.3 through December 11, 2027 Exhibit 10.4 through December 11, 2027

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

Brent J. Fields Secretary