

MAIL STOP 3561

March 4, 2009

Mr. J. David Brow, CEO
Neema, Inc.
421 9th Street
Manhattan Beach, CA 90266

Re: Neema, Inc.
Form 10-KSB for Fiscal Year Ended April 30, 2008
Filed July 31, 2008
File No. 000-52874

Dear Mr. Brow:

We issued comments to you on the above captioned filings on February 2, 2009. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by March 18, 2009 to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by March 18, 2009, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filing(s), consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>

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Please contact Blaise Rhodes at (202) 551-3774 or Brian Bhandari at (202) 551-3390 if you have questions.

Sincerely,

Tia Jenkins
Senior Assistant Chief Accountant
Office of Beverages, Apparel and
Health Care Services