



DIVISION OF  
CORPORATION FINANCE

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

May 6, 2011

Glade M. Knight  
Chief Executive Officer  
Apple REIT Nine, Inc.  
814 East Main Street  
Richmond, Virginia 23219

**Re: Apple REIT Nine, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2009  
Form 10-Q for the Fiscal Quarters Ended January 31, 2010, June 30,  
2010, and September 30, 2010  
File No. 000-53603**

Dear Mr. Knight:

We have completed our review of your filings. 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 filings 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 filings to be certain that the filings includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

Cicely LaMothe  
Senior Assistant Chief Accountant