

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

February 14, 2025

Marilu Brassington Interim Chief Accounting Officer Scepter Holdings, Inc. NV 2278 Monitor St Dallas, Texas 75207

> Re: Scepter Holdings, Inc. NV Registration Statement on Form 10-12G Filed September 18, 2024 File No. 000-56689

Dear Marilu Brassington:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Steven Davis