



DIVISION OF  
CORPORATION FINANCE

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

February 10, 2012

Via E-mail

Richard Wei, Chief Financial Officer  
Shanda Games Limited  
No. 1 Office Building  
No. 690 Bibo Road  
Pudong New Area  
Shanghai 201203, Peoples Republic of China

**Re: Shanda Games Limited**  
**Form 20-F for the Fiscal Year Ended December 31, 2010**  
**Filed May 25, 2011**  
**File No. 001-34454**

Dear Mr. Wei:

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

Sincerely,

/s/ Patrick Gilmore

Patrick Gilmore  
Accounting Branch Chief