

DIVISION OF

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

February 2, 2022

BY E-MAIL

Steven B. Boehm Eversheds Sutherland (US) LLP 700 Sixth Street, NW, Suite 700 Washington, DC 20001-3980

Re: <u>Runway Growth Credit Fund Inc. File No. 812-14941</u>

Dear Mr. Boehm:

By Form APP-WD filed with the Securities and Exchange Commission on November 5, 2021, you requested, on behalf of applicants, that the above-referenced application, most recently filed on October 21, 2020, be withdrawn. Please be advised that your request for withdrawal has been granted, pursuant to delegated authority.

Sincerely,

/s/ Terri G. Jordan

Terri G. Jordan Branch Chief

cc: R. David Spreng, Runway Growth Credit Fund Inc.
Thomas B. Raterman, Runway Growth Credit Fund Inc.
Stephani M. Hildebrandt, Esq, Eversheds Sutherland (US) LLP
Anne G. Oberndorf, Esq., Eversheds Sutherland (US) LLP