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U.S. Listing Qualifications & Market Surveillance

March 21, 2023

Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Division of Corporation Finance:

This is to certify that on March 20, 2023, The Nasdaq Stock Market LLC (the "Exchange") received from Star Holdings (the "Registrant") a copy of the Registrant's application on Form 10- 12(b) for the registration of the following security:

Common shares of beneficial interest, par value \$0.001 per share

We further certify that the security described above has been approved by the Exchange for listing and registration upon official notice of issuance.

We understand that the Registrant is seeking effectiveness of the Form 10-A 12(b) concurrently with effectiveness of its 1933 Act Registration Statement, and we hereby join in such request.

Sincerely,

