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2005 NOV -8 P 1:22  
OFFICE OF INTERNATIONAL  
CORPORATE FINANCE

November 4, 2005

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Securities and Exchange Commission  
Office of International Corporate Finance  
450 Fifth Street, N.W.  
Washington, D.C. 20549  
U. S. A.  
Attn: Mr. Paul Dudek

SUPPL

Re: File Number: 82-5233

Dear Mr. Dudek:

Pursuant to Rule 12g3-2(b)(1)(iii) under the Securities Exchange Act of 1934, we, as legal advisers to BELLUNA CO., LTD. (whose file number is 82-5233), enclose herewith the following information:

- Notice of Repurchase of Own Shares from the Market dated November 4, 2005

Thank you for your attention.

Yours truly,

*Seishi Ikeda*  
Seishi Ikeda

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Enclosure

cc: BELLUNA CO., LTD. (w/o attachment)  
THE BANK OF NEW YORK (with attachment)

*DeWitt*

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November 4, 2005

Dear Sirs:  
OFFICE OF INTERNATIONAL  
CORPORATE FINANCE

Name of Company: BELLUNA CO., LTD.

Code No. 9997 1st Section of the Tokyo Stock Exchange

Notice of Repurchase of Own Shares from the Market

The Company repurchased its own shares at the market pursuant to Sub-section 2 of Section 1 of Article 211-3 of Japanese Commercial Code as described below.

1. Period of repurchase: From October 1st to 31st, 2005
2. Number of shares repurchased: 24,750 shares
3. Total cost of repurchase: 85,940,500 yen
4. Method of repurchase: Repurchased at the Tokyo Stock Exchange

Note1: Details resolved at the Board of Directors' meeting held on July 7th, 2005

- Type of shares to be repurchased: Common shares
- Number of shares to be repurchased: 300,000 shares (maximum)
- Total value of shares to be repurchased: 1,000 million-yen (maximum)

Note2: Total number of shares and cost of the repurchase from July 7th, 2005, when Board of Directors' meeting was held, to October 31st, 2005 is as follows:

- Total number of shares repurchased: 116,800 shares
- Total value of shares repurchased: 378,020,000 yen

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