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Sent Via Facsimile

June 26, 2017

Margaret Baldwin
United States Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
Fax: 202-772-9325

Re: *In the Matter of the Application of 6D Global Technologies, Inc.,*
Admin. Proc. File No. 3-17908

Dear Mr. Fields:

I write in response to the June 21, 2017 letter sent to the Commission on behalf of 6D Global Technologies, Inc. ("6D") in the above-captioned matter. 6D has applied to the Commission for review of Nasdaq's decision to delist the company. 6D has conceded that it filed its application more than three months after the applicable deadline under Rule 420 of the Commission's Rules of Practice. Accordingly, Nasdaq moved to dismiss the application as untimely; and pursuant to the Commission's subsequent order, that motion has been fully briefed. Order, Release No. 80492 (Apr. 19, 2017).

In its unauthorized letter, 6D now contends that recent developments in a separate litigation supply the "extraordinary circumstances" necessary to excuse the company's tardiness. The recent developments are two evidentiary rulings in the federal criminal case against Benjamin Wey—a case to which neither 6D nor Nasdaq is a party. That 6D must resort to developments in other litigation illustrates the weakness of the company's position, and the harmful consequences to the regulatory system of accepting it: Dilatory applicants would seek to invoke developments in distinct matters to claim extraordinary circumstances, and then flood the Commission with late applications. That would destroy the Commission's 30-day deadline.

6D does not explain how these subsequent evidentiary rulings justify its failure to file its application until three months after the Commission-imposed deadline.

Moreover, 6D evidently wishes to jump over its procedural default to get to the merits; but neither evidentiary ruling bears on the merits of the delisting decision. One ruling suppressed evidence found during an FBI search of Wey's home, and another ruling denied Nasdaq's motion to quash Wey's third-party subpoena directed to certain of Nasdaq's internal materials. But both parties to this case have stated that Wey's involvement was irrelevant to the delisting decision. As Nasdaq has explained, the Listing Council explicitly declined to base its decision on "Wey's influence over the Company." MTD Ex. A at 13. And 6D itself noted, in a signed pleading filed in federal district court, that Nasdaq "denied 6D's delisting appeal *not because of any alleged involvement by Wey.*" *Puddu v. 6D Global Techs., Inc.*, No. 15-cv-8061, Dkt. 113 at 7 n.1 (S.D.N.Y. Aug. 19, 2016) (emphasis added).

6D's attempt to rescue its untimely application based on tangential matters in separate litigation contravenes the finality of the Commission's Rules. Nothing in any of 6D's submissions excuses its untimely application, and the Commission should grant Nasdaq's motion to dismiss.

Respectfully,



John M. Yetter
Vice President and Deputy General Counsel

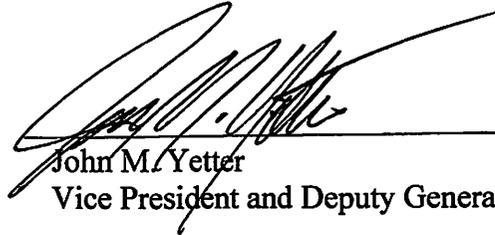
cc: Paula D. Shaffner
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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2017, I caused a true and correct copy of the foregoing to be served on the following by facsimile:

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