

Mail Stop 6010

April 15, 2008

David Platt, Ph.D.  
Chief Executive Officer and Chairman of the Board  
Pro-Pharmaceuticals, Inc.  
7 Wells Avenue  
Newton, Massachusetts 02459

**Re: Pro-Pharmaceuticals, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed April 3, 2008  
File No. 1-31791**

Dear Dr. Platt:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

Jeffrey P. Riedler  
Assistant Director

cc: Jonathan C. Guest, Esq.  
Greenberg Traurig LLP  
One International Place  
Boston, Massachusetts 02110