

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

June 21, 2023

Chi Wai Dennis Tam Co-Chief Executive Officer Black Spade Acquisition Co Suite 2902, 29/F, The Centrium 60 Wyndham Street Central, Hong Kong

> Re: Black Spade Acquisition Co Preliminary Proxy Statement on Schedule 14A Filed June 9, 2023 File No. 001-40616

Dear Chi Wai Dennis Tam:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Real Estate & Construction

cc: James Lin, Esq.