

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

CORPORATION FINANCE

January 29, 2025

Alexander Karavaev Chief Financial Officer GDEV Inc. 55 Griva Digeni 3101, Limassol Cyprus

Re: GDEV Inc.

Form 20-F for the Fiscal Year Ended December 31, 2023 File No. 001-40758

Dear Alexander Karavaev:

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 Technology

J. David Stewart cc: