

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

August 7, 2025

Robert Weingarten Vice President and Chief Financial Officer LIXTE BIOTECHNOLOGY HOLDINGS, INC. 680 East Colorado Boulevard Suite 180 Pasadena, CA 91101

> Re: LIXTE BIOTECHNOLOGY HOLDINGS, INC. Form 10-K for the Fiscal Year Ended December 31, 2024 File No. 001-39717

Dear Robert Weingarten:

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 Life Sciences

cc: David Ficksman, Esq.