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PARADIGM MEDICAL INDUSTRIES INC  
Form RW  
June 17, 2003

PARADIGM MEDICAL INDUSTRIES, INC.  
2355 South 1070 West  
Salt Lake City, Utah 84119

June 2, 2003

VIA EDGAR

Securities and Exchange Commission  
450 Fifth Street, N.W.  
Judicial Plaza  
Washington, D.C. 20549

Attn: Peggy A. Fisher,  
Assistant Director

Re: Paradigm Medical Industries, Inc.  
Application for Withdrawal of Registration Statement on Form S-3  
Commission File No. 333-105115

Ladies and Gentlemen:

Paradigm Medical Industries, Inc., a Delaware corporation (the "Registrant") hereby requests pursuant to Rule 477(a) of the Securities Act of 1933, as amended, that the Securities and Exchange Commission (the "Commission") consent to the withdrawal of the Registrant's registration statement No. 333-105115, which was previously filed with the Commission on May 9, 2003, on Form S-3, along with any exhibits and amendments filed thereto (the "Registration Statement").

The Registration Statement was filed to register for resale shares of Registrant's common stock that the Registrant may issue through a private equity line of credit agreement. The Registrant has determined that it is not in the best interests of its shareholders at this time to obtain financing through a private equity line of credit. For this reason, Registrant requests a withdrawal of the Registration Statement.

No securities of Registrant have been sold in connection with the Registration Statement. The Registration Statement has not been declared effective by the Commission.

Please direct any questions or comments regarding this filing to the undersigned at (801) 977- 8970 or Randall A. Mackey, Esq. at (801) 575-5000.

Very truly yours,

Paradigm Medical Industries, Inc.

/s/ Jeffrey F. Poore

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Jeffrey F. Poore  
President and Chief Executive Officer