EUDA HEALTH HOLDINGS LIMITED

1 Pemimpin Drive #12-06 One Pemimpin Singapore 576151

October 31, 2024

VIA EDGAR

U.S. Securities and Exchange Commission Division of Corporation Finance Office of Technology 100 F Street, N.E. Washington, D.C. 20549 Attention: Benjamin Richie

Re: EUDA Health Holdings Ltd. Registration Statement on Form F-3 File No. 333-282723

Dear Ms. Richie:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, the registrant, EUDA Health Holdings Limited hereby requests acceleration of effectiveness of the above-referenced Registration Statement so that it will become effective at 4:00 p.m. ET on Monday, November 4, 2024, or as soon as practicable thereafter.

Very truly yours,

EUDA Health Holdings Limited

By: /s/ Kelvin Chen

Name: Kelvin Chen Title: Chief Executive Officer