

**BioDrain Medical, Inc.**  
**2060 Centre Pointe Boulevard, Suite 7**  
**Mendota Heights, Minnesota 55120**

October 15, 2009

**VIA FACSIMILE AND EDGAR**

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

**Re: BioDrain Medical, Inc.**  
**Registration Statement – Form S-1 (Registration No. 333-155299)**

Ladies and Gentlemen:

BioDrain Medical, Inc. (the “Company”) hereby requests that the Commission take appropriate action to cause the above-referenced registration statement on Form S-1 to become effective on October 19, 2009 at 9:00 a.m. Washington, D.C. time.

The Company hereby acknowledges the following:

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Very truly yours,

BIODRAIN MEDICAL, INC.

By: /s/ Kevin Davidson  
Kevin Davidson  
Chief Executive Officer

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