



Davis Polk & Wardwell  
Hong Kong Solicitors  
The Hong Kong Club Building  
3A Chater Road  
Hong Kong

852 2533 3300 tel

New York  
Northern California  
Washington DC  
São Paulo  
London

Paris  
Madrid  
Hong Kong  
Beijing  
Tokyo

**Resident Hong Kong Partners**

Karen Chan †      Martin Rogers †  
Yang Chu †      Patrick S. Sinclair\*  
James C. Lin\*      Miranda So\*  
Gerhard Radtke\*      James Wadham†

*Hong Kong Solicitors*

*\* Also Admitted in New York*

*† Also Admitted in England and Wales*

February 4, 2021

**Re:      Adagene Inc.  
         Daniel Auerbach Resignation Letters**

**VIA EDGAR**

Mr. Jason Drory  
Ms. Celeste Murphy  
Office of Life Sciences  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

Dear Mr. Jason Drory and Ms. Celeste Murphy:

On behalf of Adagene Inc. (the “**Company**”), an exempted company with limited liability incorporated under the laws of the Cayman Islands, we submit to the staff (the “**Staff**”) the enclosed resignation letters (the “**Resignation Letters**”) of Daniel Auerbach, a member of each of the boards of directors (the “**Boards**”) of the Company and certain of its subsidiaries, including Adagene (Hong Kong) Limited, Adagene Incorporated and Adagene (Suzhou) Limited. The Resignation Letters were previously delivered to the Company to inform it that Mr. Auerbach will automatically resign as a member of each of the Boards effective as of immediately prior to, and contingent upon, the effectiveness of the Company’s registration statement on Form F-1 (File No.: 333-252210), and that Mr. Auerbach will not be responsible for any part of such registration statement.

This letter is being furnished to the Staff in accordance with Section 11(b)(1) of the Securities Act of 1933, as amended, to notify the Staff that Mr. Auerbach will not be responsible for the contents of the Company’s registration statement on Form F-1 (File No.: 333-252210), including any amendments thereto.

If you have any questions regarding these matters, please contact Li He at +852 2533-3306 (li.he@davispolk.com) or Steve Wang at +852 2533-1092 (xuelin.wang@davispolk.com).

Thanks for your time and attention.

Davis Polk includes Davis Polk & Wardwell LLP and its associated entities.

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Yours sincerely,

/s/ Li He

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cc: Mr. Peter (Peizhi) Luo, Chief Executive Officer and Chairman  
Mr. Raymond Tam, Chief Financial Officer  
Adagene Inc.

February 4<sup>th</sup>, 2021

**Adagene Inc.**

4F, Building C14, No. 218  
Xinghu Street, Suzhou Industrial Park  
Suzhou, Jiangsu Province, 215123  
People's Republic of China  
To the Board of Directors

Re: Resignation as a Director

Ladies and Gentlemen:

I, Daniel Auerbach, write to inform you that I hereby automatically resign from the board of directors (the "Board") of Adagene Inc. (the "Company"), and all committees of the Board (if any), effective as of immediately prior to, and contingent upon, the effectiveness of the Company's registration statement on Form F-1 (File No.: 333-252210) in connection with the Company's initial public offering, and that I will not be responsible for any part of such registration statement. In the event that such registration is not effective prior to February 28, 2021, this letter of resignation shall be deemed withdrawn without having been given effect.

Very truly yours,

/s/ Daniel Auerbach

\_\_\_\_\_  
Name: Daniel Auerbach

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February 4<sup>th</sup>, 2021

**Adagene (Hong Kong) Limited**

Room 2701, 27/F, Tesbury Centre

28 Queen's road

Central, HK

To the Board of Directors

Re: Resignation as a Director

Ladies and Gentlemen:

I, Daniel Auerbach, write to inform you that I hereby automatically resign from the board of directors (the "Board") of Adagene (Hong Kong) Limited (the "Company"), and all committees of the Board (if any), effective as of immediately prior to, and contingent upon, the effectiveness of the registration statement on Form F-1 (File No.: 333-252210) of Adagene Inc. ("Adagene"), the sole shareholder of the Company, in connection with Adagene's initial public offering. In the event that such registration is not effective prior to February 28, 2021, this letter of resignation shall be deemed withdrawn without having been given effect.

Very truly yours,

/s/ Daniel Auerbach

\_\_\_\_\_  
Name: Daniel Auerbach

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February 4<sup>th</sup>, 2021

**Adagene Incorporated**

315 Montgomery St., Suite 900

San Francisco, CA 94104

To the Board of Directors

Ladies and Gentlemen:

I, Daniel Auerbach, write to inform you that I hereby automatically resign from the board of directors (the “Board”) of Adagene Incorporated (the “Company”), and all committees of the Board (if any), effective as of immediately prior to, and contingent upon, the effectiveness of the registration statement on Form F-1 (File No.: 333-252210) of Adagene Inc. (“Adagene”), the sole shareholder of the Company, in connection with Adagene’s initial public offering. In the event that such registration is not effective prior to February 28, 2021, this letter of resignation shall be deemed withdrawn without having been given effect.

Very truly yours,

/s/ Daniel Auerbach

\_\_\_\_\_  
Name: Daniel Auerbach

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February 4<sup>th</sup>, 2021  
2021 年 2 月 4 日

**Adagene (Suzhou) Limited**

苏州爱登基因有限公司

4F, Building C14, No. 218  
Xinghu Street, Suzhou Industrial Park  
Suzhou, Jiangsu Province, 215123  
People's Republic of China

218 号 C14 楼 4 层  
苏州工业园区星湖街  
苏州工业园区, 邮编 215123  
中国

To the Board of Directors

董事们

Re: Resignation as a Director

辞职

Ladies and Gentlemen:

女士们先生们

I, Daniel Auerbach, write to inform you that I hereby automatically resign from the board of directors (the "Board") of Adagene (Suzhou) Limited (the "Company"), and all committees of the Board (if any), effective as of immediately prior to, and contingent upon, the effectiveness of the registration statement on Form F-1 (File No.: 333-252210) of Adagen Inc. ("Adagene"), the Company's 100% indirect parent company, in connection with Adagene's initial public offering. In the event that such registration is not effective prior to February 28, 2021, this letter of resignation shall be deemed withdrawn without having been given effect.

本人 Daniel Auerbach 特此通知，我在此自动辞去爱登基因有限公司（以下简称“公司”）的董事会（以下简称“董事会”）的所有委员会（如有）的职务，自爱登基因有限公司（以下简称“公司”）的 F-1 表格（文件编号：333-252210）注册说明书生效之日（即 2021 年 2 月 28 日）起生效。如果该注册说明书在 2021 年 2 月 28 日之前未能生效，则本辞职信将被视为撤回，且不具有任何效力。

Very truly yours,

丹尼尔·奥厄巴赫

/s/ Daniel Auerbach

Name 姓名: Daniel Auerbach

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