



October 20, 2006

VIA EDGAR TRANSMISSION AND FACSIMILE

(202) 772-9369

Jeffrey Riedler
Assistant Director
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 7010
Washington, D.C. 20549

Re: Cadence Pharmaceuticals, Inc.
Registration Statement on Form S-1
File No. 333-135821

Dear Mr. Reidler:

Pursuant to Rule 461 of Regulation C of the General Rules and Regulations under the Securities Act of 1933, as amended, the undersigned, on behalf of Cadence Pharmaceuticals, Inc. (the "Company"), respectfully requests that the effective date of the Registration Statement on Form S-1 referred to above be accelerated so that it will become effective at 3:00 P.M. Eastern Time on Tuesday, October 24, 2006, or as soon as practicable thereafter.

The undersigned, on behalf of the Company, 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.
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This request for acceleration is subject, however, to your receiving a telephone call prior to such time from our legal counsel, Latham & Watkins LLP, confirming this request.

Thank you for your assistance and cooperation in this matter.

Very truly yours,

Cadence Pharmaceuticals, Inc.

By: /s/ Theodore R. Schroeder
Theodore R. Schroeder
President and Chief Executive
Officer

cc: Greg Belliston, *Securities and Exchange Commission*
Cheston J. Larson, Esq., *Latham & Watkins LLP*
Ali Fawaz, Esq., *Latham & Watkins LLP*