

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
February 23, 2011**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES ACT OF 1933**

**Cumberland Pharmaceuticals Inc.**

**File No. 333-142535 - CF#26246**

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Cumberland Pharmaceuticals Inc. submitted an application under Rule 406 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibits to a Form S-1 registration statement filed on May 1, 2007, as amended.

Based on representations by Cumberland Pharmaceuticals Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

|                |                          |
|----------------|--------------------------|
| Exhibit 10.1   | through January 23, 2012 |
| Exhibit 10.3   | through January 23, 2012 |
| Exhibit 10.3.1 | through January 23, 2012 |

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Daniel Greenspan  
Special Counsel