

July 12, 2019

**VIA EDGAR**

Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
Attn: Don Field

**Re: Xenetic Biosciences, Inc.  
Registration Statement on Form S-1  
File No. 333-231508**

Ladies and Gentlemen:

As the underwriter of the proposed offering of Xenetic Biosciences, Inc. (the "**Company**"), we hereby withdraw our prior letter to join the acceleration request of the Company dated July 10, 2019 for the above-referenced Registration Statement.

Very truly yours,

**Maxim Group LLC**

By: /s/ Clifford A. Teller

Name: Clifford A. Teller

Title: Head of Investment Banking, Executive Managing Director