

WASHINGTON SERVICE BUREAU, INC.

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LETTER:	<i>Bio-Medical Sciences</i>
WSB DIVISION #.	<i>33- Rule 144</i>
FILE # WITHIN DIVISION	<i>69</i>
File # listed in file guide under	<i>33-4(1)</i>
PUBLIC AVAILABILITY DATE	<i>5-8-74</i>

Act	<i>33</i>
Section	<i>4(1)</i>
Rule	<i>144</i>
Public Availability	<i>5-8-74</i>

Jerome S. Zurkow, Esq.
 Hein, Waters, Klein and Zurkow
 450 Park Avenue
 New York, New York 10022

APR 3 1974

Re: Bio-Medical Sciences, Inc.

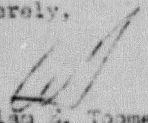
Dear Mr. Zurkow:

This is with reference to your letter of January 30, 1974 concerning the applicability of paragraph (d) of Rule 144 to the proposed sale under Rule 144 of the Securities Act of 1933 (the "Act") by Mr. Benjamin Heller of 3,000 shares of restricted common stock of Bio-Medical Sciences, Inc. (the "Company"). The shares were acquired from Mr. Stanley S. Kreutzer in October, 1973 pursuant to a settlement agreement.

Mr. Heller asserts that the 37,800 shares of restricted common stock acquired by Mr. Kreutzer from the Company in 1968 were acquired in consideration of services rendered to the Company by the law partnership of Kreutzer, Heller, Selman and Galt. He claims that the 3,000 shares acquired by him in October, 1973 from Mr. Kreutzer, pursuant to an out-of-court settlement agreement, were transferred to him in recognition of his beneficial interest as a member of the partnership. The settlement agreement, however, contained a statement that the agreement did not constitute an admission by Mr. Kreutzer that the claims asserted by Mr. Heller in his complaint were meritorious, or that the shares were a partnership's asset.

Based on the facts presented as more fully set forth in your letter, the Division is of the view that Mr. Heller's holding period for the 3,000 shares of restricted common stock of Bio-Medical Sciences, Inc. began in October, 1973, when the shares were actually issued pursuant to the settlement agreement.

Sincerely,


 William E. Toomey
 Assistant Chief Counsel

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