

April 9, 2024

Jorge A. Celaya  
Executive Vice President and Chief Financial Officer  
Liquidity Services, Inc.  
6931 Arlington Road  
Suite 460  
Bethesda, MD 20814

Inc.  
Fiscal Year Ended September 30, 2023  
Security Holders for Fiscal Year Ended September 30, 2023

Re: Liquidity Services,  
Form 10-K for  
Annual Report to  
File No. 0-51813

Dear Jorge A. Celaya:

We have reviewed your  
filings and have the following comment(s).

Please respond to this letter within ten business days by  
providing the requested  
information or advise us as soon as possible when you will respond. If  
you do not believe a  
comment applies to your facts and circumstances, please tell us why in  
your response.

After reviewing your  
response to this letter, we may have additional comments.

Annual Report to Security Holders for Fiscal Year Ended September 30,  
2023

FY23 Business Highlights, page 4

1. We note you present  
non-GAAP measures of Free Cash Flow, Non-GAAP Adjusted Net  
Income and Income Tax  
Impact of the Non-GAAP Adjustments on page 4 of your Annual  
Report to Security  
Holders. Please revise to include the disclosures required by Item  
100(a) of Regulation G.

We remind you that the company and its management are  
responsible for the accuracy  
and adequacy of their disclosures, notwithstanding any review, comments,  
action or absence of  
action by the staff.

Jorge A. Celaya  
Liquidity Services, Inc.  
April 9, 2024  
Page 2

Please contact Valeria Franks at 202-551-7705 or Blaise Rhodes at  
202-551-3774 with  
any questions.

FirstName LastNameJorge A. Celaya  
Comapany NameLiquidity Services, Inc.

Sincerely,  
Division of  
Office of Trade &

Corporation Finance  
April 9, 2024 Page 2  
Services  
FirstName LastName