WILLS STEPHEN T

1. Name and Address of Reporting Person*

PALATIN TECHNOLOGIES INC [ PTN ]

2. Issuer Name and Ticker or Trading Symbol

11/10/2005

3. Date of Earliest Transaction (Month/Day/Year)

Exec. VP & CFO

5. Relationship of Reporting Person(s) to Issuer

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

1. Title of Security (Instr. 3)

4. If Amendment, Date of Original Filed

common stock

4.000

Amount

A

$2.01

28,500

D

5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4)

6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)

7. Nature of Indirect Beneficial Ownership (Instr. 4)

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned

e.g., puts, calls, warrants, options, convertible securities

Explanation of Responses:

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

Stephens T. Wills 11/10/2005

** Signature of Reporting Person Date