

Progenity, Inc.  
4330 La Jolla Village Drive, Suite 200  
San Diego, CA 92122  
(855) 293-2639

March 30, 2021

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, DC 20549

Attn: Tim Buchmiller

**Re: Progenity, Inc.  
Registration Statement on Form S-1  
Filed March 19, 2021  
File No. 333-254471**

Ladies and Gentlemen:

Pursuant to Rules 460 and 461 promulgated under the Securities Act of 1933, as amended, Progenity, Inc., a Delaware corporation (the "Company"), hereby respectfully requests that the effective time of the above referenced Registration Statement on Form S-1 filed by the Company (the "Registration Statement") be accelerated to 4:01 p.m., Eastern Standard Time, on April 1, 2021 or as soon thereafter as practicable.

*[Signature page follows]*

Very truly yours,

**Progenity, Inc.**

By: /s/ Harry Stylli, Ph.D.

Name: Harry Stylli, Ph.D.

Title: Chairman and Chief Executive Officer

cc: Ryan A. Murr, Gibson, Dunn & Crutcher LLP