

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

August 9, 2024

Ameet Mallik Chief Executive Officer ADC Therapeutics SA Biopôle Route de la Corniche 3B 1066 Epalinges Switzerland

> Re: ADC Therapeutics SA Registration Statement on Form S-3 Filed August 6, 2024 File No. 333-281288

Dear Ameet Mallik:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Joshua Gorsky at 202-551-7836 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: David Li