



DIVISION OF  
CORPORATION FINANCE

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

July 23, 2024

Jaisim Shah  
Chief Executive Officer & President  
Scilex Holding Company  
960 San Antonio Road  
Palo Alto, CA 94303

**Re: Scilex Holding Company  
Registration Statement on Form S-3  
Filed July 18, 2024  
File No. 333-280882**

Dear Jaisim Shah:

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 Tim Buchmiller at 202-551-3635 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Elizabeth A. Razzano, Esq.