

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

June 16, 2020

Peter Mariani Chief Financial Officer Axogen, Inc. 13631 Progress Boulevard, Suite 400 Alachua, FL 32615

Re: Axogen, Inc.

Form 10-K for the Fiscal Year Ended December 31, 2019 Filed February 24, 2020

File No. 001-36046

Dear Mr. Mariani:

We have completed our review of your filings. 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.

Sincerely,

Division of Corporation Finance Office of Life Sciences