

March 29, 2021

Harry Stylli, Ph.D.
Chairman and Chief Executive Officer
Progenity, Inc.
4330 La Jolla Village Drive, Suite 200
San Diego, CA 92122

Re: Progenity, Inc.
Registration

Statement on Form S-1

2021

Filed March 19,

File No. 333-254471

Dear Dr. Stylli:

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:

Ryan A. Murr, Esq.