



June 16, 2020

VIA EDGAR AND EMAIL

United States Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, D.C. 20549
Attention: Paul Fischer
Celeste M. Murphy

Re: Progenity, Inc.
Registration Statement on Form S-1 (File No. 333-238738)

Dear Mr. Fischer and Ms. Murphy:

Pursuant to Rule 461 under the Securities Act of 1933, as amended (the “**Act**”), Progenity, Inc. (the “**Company**”) hereby requests that the effective date of the above-referenced registration statement (the “**Registration Statement**”) be accelerated to June 18, 2020, at 4:00 p.m., Eastern Time, or as soon thereafter as practicable, unless we or our outside counsel, Gibson, Dunn & Crutcher LLP, request by telephone that such Registration Statement be declared effective at some other time. In making this acceleration request, the Company acknowledges that it is aware of its obligations under the Act.

Once the Registration Statement is effective, please orally confirm the event with our counsel, Gibson, Dunn & Crutcher LLP, by calling Branden C. Berns at (415) 393-4631.

Sincerely,

PROGENITY, INC.

/s/ Eric d’Esparbes

Eric d’Esparbes
Chief Financial Officer

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