

January 18, 2023

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

Statement on Form S-1  
2023

Re: Scilex Holding Co  
Registration

Filed January 12,

File No. 333-269205

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 Jason

Drory at 202-551-8342 with any questions.

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:

Elizabeth Razzano