

**Pagaya Technologies Ltd.**  
Azrieli Sarona Bldg, 54<sup>th</sup> Floor  
121 Derech Menachem Begin  
Tel Aviv 6701203, Israel

May 1, 2023

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Trade & Services  
100 F Street, N.E.  
Washington, D.C. 20549

RE: **Pagaya Technologies Ltd.**  
**Registration Statement on Form F-1**  
**File No. 333-271343**  
**Request for Acceleration of Effective Date**

**Requested Date: May 3, 2023**  
**Requested Time: 4:00 P.M. Eastern Time**

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, the undersigned registrant (the “**Registrant**”) hereby requests that the U.S. Securities and Exchange Commission (the “**Commission**”) take appropriate action to cause the above-referenced Registration Statement on Form F-1 (the “**Registration Statement**”) to become effective on May 3, 2023, at 4:00 p.m., Eastern Time, or as soon thereafter as is practicable or at such later time as the Registrant may orally request via telephone call to the staff of the Commission. The Registrant hereby authorizes each of John T. McKenna, Rupa Briggs and Natalie Y. Karam of Cooley LLP, counsel to the Registrant, to make such request on its behalf.

Once the Registration Statement has been declared effective, please orally confirm that event with John T. McKenna of Cooley LLP, counsel to the Registrant, at (650) 843-5059, or in his absence, Rupa Briggs at (212) 479-6525 or Natalie Y. Karam at (650) 843-5778.

Very truly yours,  
**PAGAYA TECHNOLOGIES LTD.**

By: /s/ Gal Krubiner  
Name: Gal Krubiner  
Title: Chief Executive Officer

By: /s/ Michael Kurlander  
Name: Michael Kurlander  
Title: Chief Financial Officer

cc: John T. McKenna, Cooley LLP  
Rupa Briggs, Cooley LLP  
Natalie Y. Karam, Cooley LLP