Gal Krubiner Chief Executive Officer Pagaya Technologies Ltd. 90 Park Ave, 20th Floor New York, NY 10016

Re: Pagaya Technologies Ltd.
Registration Statement on Form F-3
Filed November 21, 2024
File No. 333-283393

Dear Gal Krubiner:

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 Aisha Adegbuyi at 202-551-8754 with any questions.

Sincerely,

Division of

Corporation Finance

Office of Finance

cc: Byron B. Rooney, Esq.