

September 30, 2022

VIA EDGAR

United States Securities and Exchange Commission
Division of Corporation Finance
Office of Trade & Services
100 F Street, NE
Washington, D.C. 20549

Attn: Tonya K. Aldave
John Dana Brown

**Re: Pagaya Technologies Ltd.
Amendment No. 3 to the Registration Statement on Form F-1
Filed September 30, 2022
File No. 333-266228**

Dear Tonya K. Aldave and John Dana Brown:

On behalf of our client, Pagaya Technologies Ltd., an Israeli corporation (the “*Company*”), we are writing to provide the Company’s responses in the above-referenced Amendment No. 3 to the Registration Statement on Form F-1, filed on September 30, 2022 (the “*Registration Statement*”) to the additional comments of the staff of the Division of Corporation Finance of the United States Securities and Exchange Commission (the “*Staff*”) contained in the Staff’s letter dated September 14, 2022 (the “*Comment Letter*”) on the Company’s Amendment No. 1 to Registration Statement on Form F-1 (333-266930), filed on September 6, 2022.

The Company has publicly filed via EDGAR Amendment No. 3 to its Registration Statement on Form F-1 (“*Amendment No. 3*”), which reflects the Company’s responses to the comments received by the Staff in the Comment Letter and certain updated information. Such updates are made on pages 17-19, 30, 60, 79 and 91-94 of Amendment No. 3.

Please do not hesitate to contact Kathy Shao at (212) 735-2012 or Andrea Nicolás at (212) 735-3416 of Skadden, Arps, Slate, Meagher & Flom LLP with any questions or comments regarding this letter.

Sincerely,

/s/ Skadden, Arps, Slate, Meagher & Flom LLP
Skadden, Arps, Slate, Meagher & Flom

cc: Richmond Glasgow, Pagaya Technologies Ltd.
