

**PAGAYA TECHNOLOGIES LTD.**  
Azrieli Sarona Bldg, 54<sup>th</sup> Floor  
121 Derech Menachem Begin  
Tel Aviv 6701203, Israel

December 2, 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.**  
**Registration Statement on Form F-1**  
**File No. 333-266228**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Pagaya Technologies Ltd. (the "Company") hereby requests acceleration of the effective date of the above referenced Registration Statement to 4:00 p.m., Eastern Time, on December 6, 2022, or as soon thereafter as practicable, or at such other time as the Company or its outside counsel, Skadden, Arps, Slate, Meagher & Flom LLP, request by telephone that such Registration Statement be declared effective.

Please contact Kathy Shao or Andrea Nicolás of Skadden, Arps, Slate, Meagher & Flom LLP at (212) 735-2012 or (212) 735-3416, respectively, as soon as the Registration Statement has been declared effective, or if you have any other questions or concerns regarding this matter.

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: Richmond Glasgow, Pagaya Technologies Ltd.  
Andrea Nicolás, Skadden, Arps, Slate, Meagher & Flom LLP

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