

**Babylon Holdings Limited**  
**1 Knightsbridge Green**  
**London, SW1X 7QA**

May 4, 2022

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-6010  
Attention: Michael Davis

Re: **Babylon Holdings Limited**  
Registration Statement on Form F-1  
File No. 333-264594

Ladies and Gentlemen:

In accordance with Rule 461 of Regulation C of the General Rules and Regulations under the Securities Act of 1933, as amended, we hereby request acceleration of the effective date of the above referenced Registration Statement on Form F-1 (the "Registration Statement") of Babylon Holdings Limited (the "Company"). We respectfully request that the Registration Statement become effective as of 4:00 p.m. Eastern Time on May 6, 2022, or as soon as practicable thereafter. Once the Registration Statement has been declared effective, please orally confirm that event with our counsel, Latham & Watkins LLP, by calling Ryan Maierson at (713) 546-7420 or, in his absence, Julia Thompson at (202) 637-1073.

Thank you for your assistance in this matter.

Very truly yours,

**BABYLON HOLDINGS LIMITED**

By: /s/ Charles Steel

Charles Steel  
Chief Financial Officer

cc: Ryan J. Maierson, Latham & Watkins LLP  
Julia Thompson, Latham & Watkins LLP

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