

BABYLON HOLDINGS LIMITED

2500 Bee Cave Road
Building 1 — Suite 400
Austin, Texas 78746

December 1, 2022

VIA EDGAR

Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, D.C. 20549-6010
Attention: Conlon Danberg

**Re: Babylon Holdings Limited
Registration Statement on Form F-3
File No. 333-268551**

To the addressee set forth above:

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-3 (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 December 5, 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, Charles Cassidy at (202) 637-2176.

Thank you for your assistance in this matter.

Very truly yours,

BABYLON HOLDINGS LIMITED

By: /s/ David Humphreys
David Humphreys
Chief Financial Officer

cc: Ryan J. Maierson, Latham & Watkins LLP
Julia A. Thompson, Latham & Watkins LLP
R. Charles Cassidy III, Latham & Watkins LLP
