

November 24, 2021

Via EDGAR

Division of Corporation Finance
U.S. Securities & Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549
Attention: Michael Davis

Re: Babylon Holdings Limited
Registration Statement on Form F-1
Filed November 9, 2021
File No. 333- 260911

Acceleration Request
Requested Date: November 30, 2021
Requested Time: 4:05 P.M. Eastern Time

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Babylon Holdings Limited (the “**Company**”) hereby requests that the above-referenced Registration Statement on Form F-1 (File No. 333-260911) (the “**Registration Statement**”) be declared effective at the “Requested Date” and “Requested Time” set forth above or as soon thereafter as practicable, or at such later time as the Company may request via telephone to the staff (the “**Staff**”) of the Securities and Exchange Commission (the “**Commission**”). The Company hereby authorizes Michael Labriola of Wilson Sonsini Goodrich & Rosati, Professional Corporation, counsel for the Company, to make such request on the Company’s behalf.

The Company requests that it be notified of the effectiveness of the Registration Statement by telephone to Michael Labriola of Wilson Sonsini Goodrich & Rosati, Professional Corporation at 202-973-8823 or via email at mlabriola@wsgr.com.

Please direct any questions or comments regarding this acceleration request to Michael Labriola at 202-973-8823.

[signature page follows]

Sincerely,

BABYLON HOLDINGS LIMITED

By: /s/ Charles Steel

Charles Steel

Chief Financial Officer

cc: Michael Labriola, Wilson Sonsini Goodrich & Rosati, P.C.
Elisa Sielski, Wilson Sonsini Goodrich & Rosati, P.C.