



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

July 7, 2025

Ameet Mallik  
Chief Executive Officer  
ADC Therapeutics SA  
Biopôle  
Route de la Corniche 3B  
1066 Epalinges  
Switzerland

**Re: ADC Therapeutics SA**  
**Registration Statement on Form S-3**  
**Filed June 30, 2025**  
**File No. 333-288437**

Dear Ameet Mallik:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Chris Edwards at 202-551-6761 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Yasin Keshvargar