

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

July 23, 2025

Rajiv Shukla Chief Executive Officer Longevity Health Holdings, Inc. 2403 Sidney Street, Suite 300 Pittsburg, Pennsylvania 15203

> Re: Longevity Health Holdings, Inc. Form 10-K for the Fiscal Year Ended December 31, 2024 File No. 001-40228

Dear Rajiv Shukla:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Industrial Applications and Services