

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

June 30, 2025

John Aballi President and Chief Executive Officer Exagen Inc. 1261 Liberty Way Vista, California 92081

Re: Exagen Inc.

Registration Statement on Form S-3

Filed June 20, 2025 File No. 333-288199

Dear John Aballi:

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 Robert Augustin at 202-551-8483 with any questions.

Sincerely,

Division of Corporation Finance Office of Industrial Applications and Services

cc: Jason Miller