

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

DIVISION OF CORPORATION FINANCE

June 23, 2020

Harry Stylli, Ph.D. Chief Executive Officer Progenity, Inc. 4330 La Jolla Village Drive, Suite 200 San Diego, CA 92122

> Re: Progenity, Inc. Form S-1 Exhibit Nos. 10.15, 10.16, 10.18, 10.19 Filed May 27, 2020 File No. 333-238738

Dear Dr. Stylli:

We have concluded our assessment of your redacted exhibits for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance