

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

September 27, 2023

Russell Beyer Chief Financial Officer SAB Biotherapeutics, Inc. 2100 East 54th Street North Sioux Falls, SD 57104

> Re: SAB Biotherapeutics, Inc. Form 10-K for the Year Ended December 31, 2022 Filed April 14, 2023 File No. 001-39871

Dear Russell Beyer:

We have completed our review of your filings. 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 Life Sciences