

Via Facsimile and U.S. Mail
Mail Stop 6010

April 11, 2006

Christian S. Schade
Senior Vice President and
Chief Financial Officer
Medarex, Inc.
707 State Road
Princeton, NJ 08540

Re: Medarex, Inc.
Form 10-K for Fiscal Year Ended December 31, 2005
Filed March 15, 2006
File No. 000-19312

Dear Mr. Schade:

We have limited our review of your filing to the issue we have addressed in our comment. In our comment, we ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Consolidated Financial Statements

Notes to Consolidated Financials

Note 10. Collaboration Agreements

1. We believe your disclosure regarding your collaboration agreements could be improved. Please provide us the following information in a disclosure-type format:
 - The length and termination provisions of each agreement.

- The accounting treatment of each payment received or paid during 2003, 2004 and 2005.
- For the initial payments received, indicate your future performance obligations, the events that will trigger revenue recognition and the periods over which you will recognize revenue.

For revenue arrangements with multiple deliverables, discuss your basis for how the deliverables are divided into separate units of accounting, how the consideration received under the arrangement is allocated to the separate units of accounting, and the applicable revenue recognition criteria for each.

* * * *

Please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a letter that keys your response to our comments and provides requested information. Detailed letters greatly facilitate our review. Please file your letter on EDGAR under the form type label CORRESP.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filing includes all information required under the Securities and Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comment, please provide, in your letter, a statement from the company acknowledging that

- the company is responsible for the adequacy and accuracy of the disclosure in the filings;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

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You may contact Todd Sherman, Staff Accountant, at 202-551-3665 or Don Abbott, Senior Accountant, at 202-551-3608 if you have questions regarding the comments. In this regard, do not hesitate to contact me, at (202) 551-3679.

Sincerely,

Jim B. Rosenberg
Senior Assistant Chief
Accountant