

**Advaxis, Inc.**  
**9 Deer Park Drive, Suite K-1**  
**Monmouth Junction, NJ 08852**

October 20, 2021

U.S. Securities and Exchange Commission  
Division of Corporate Finance  
Office of Life Sciences  
100 F Street NE  
Washington, DC 20549  
Attention: David Gessert

**VIA EDGAR**

**Re: Advaxis, Inc.**  
**Registration Statement on Form S-4**  
**Filed August 25, 2021**  
**File No. 333-259065**

Dear Mr. Gessert:

In accordance with Rule 461 of Regulation C of the General Rules and Regulations under the Securities Act of 1933, as amended, we hereby request acceleration of the effective date of Amendment No. 2 to the Registration Statement on Form S-4 (File No. 333-259065) (the “**Registration Statement**”) of Advaxis, Inc. We respectfully request that the Registration Statement become effective as of 4:00 p.m., Eastern time, on October 20, 2021, or as soon as practicable thereafter. Once the Registration Statement has been declared effective, please orally confirm that event with our counsel, Morgan, Lewis & Bockius LLP, by calling Justin W. Chairman at (215) 963-5061 or Emily Drazan Chapman at (202) 739-5699.

Very Truly Yours,

Advaxis, Inc.

By: /s/ Kenneth A. Berlin

Name: Kenneth A. Berlin

Title: President and Chief Executive Officer

cc: *Morgan, Lewis & Bockius LLP*

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