

ADVAXIS, INC.
305 College Road East
Princeton, New Jersey 08540

VIA EDGAR

July 18, 2019

Christine Westbrook
Division of Corporate Finance
Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, D.C. 20549

**RE: Advaxis, Inc.
Registration Statement on Form S-1
File No. 333-232526**

Dear Ms. Westbrook:

Pursuant to Rule 461 under the Securities Act of 1933, as amended (the “**Act**”), Advaxis, Inc. (the “**Company**”) hereby requests that the effective date of the above-referenced registration statement (the “**Registration Statement**”) be accelerated to July 22, 2019, at 5:00 p.m., Eastern Time, or as soon thereafter as practicable, unless we or our outside counsel, Goodwin Procter LLP, request by telephone that such Registration Statement be declared effective at some other time.

Once the Registration Statement is effective, please orally confirm the event with our counsel, Goodwin Procter LLP by calling Kristopher D. Brown at (212) 813-8821. We also respectfully request that a copy of the written order from the Securities and Exchange Commission (the “**Commission**”) verifying the effective time and date of the Registration Statement be sent to our counsel, Goodwin Procter LLP, Attention: Kristopher D. Brown, by facsimile to (646) 558-4102.

If you have any questions regarding this request, please contact Kristopher D. Brown of Goodwin Procter LLP at (212) 813-8821.

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Sincerely,

ADVAXIS, INC.

/s/ Kenneth Berlin

Kenneth Berlin
President and Chief Executive Officer

Molly Henderson, *Advaxis, Inc.*
Kristopher D. Brown, *Goodwin Procter LLP*
Oded Har-Even, *Zysman Aharoni Gayer and Sullivan & Worcester*
Ron Ben-Bassat, *Zysman Aharoni Gayer and Sullivan & Worcester*
