

December 5, 2022

Kenneth A. Berlin  
President and Chief Executive Officer  
Advaxis, Inc.  
9 Deer Park Drive, Suite K-1  
Monmouth Junction, New Jersey 08852

Re: Advaxis, Inc.  
Registration

Statement on Form S-4

2022

Filed November 29,

File No. 333-268586

Dear Kenneth A. Berlin:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Alan

Campbell at 202-551-4224 with any questions.

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:

Justin W. Chairman