

May 12, 2023

Eddie Sullivan, Ph.D.  
President and Chief Executive Officer  
SAB Biotherapeutics, Inc.  
2100 East 54th Street North  
Sioux Falls, South Dakota 57104

Biotherapeutics, Inc.

Statement on Form S-3

Re: SAB

Registration

Filed May 9, 2023  
File No. 333-271768

Dear Eddie Sullivan:

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 Daniel Crawford at 202-551-7767 with any questions.

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:

Brian Lee, Esq.