

**Axogen, Inc.**  
13631 Progress Boulevard, Suite 400  
Alachua, Florida 32615

April 26, 2024

**VIA EDGAR**

Mr. Robert Augustin

United States Securities and Exchange Commission  
Division of Corporation Finance  
Office of Industrial Applications and Services  
100 F Street, NE  
Washington, D.C. 20549

**Re: Axogen, Inc.**  
**Registration Statement on Form S-3 (File No. 333-277689)**

Dear Mr. Augustin:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Axogen, Inc. (the "Registrant") hereby requests acceleration of effectiveness of its registration statement on Form S-3 (File No. 333-277689), as amended by pre-effective amendment No. 1 filed on March 29, 2024, to 4:30 p.m., Eastern Time, on April 29, 2024, or as soon as practicable thereafter.

The Registrant requests that it be notified of such effectiveness by a telephone call to Jaclyn Liu of Morrison & Foerster LLP at (415)268-6722.

Very truly yours,

Axogen, Inc.

By: /s/ Marc Began

Name: Marc A. Began

Title: Executive Vice President and General Counsel