

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

May 15, 2025

Blair JordanChief Executive Officer180 Life Sciences Corp.3000 El Camino Real, Bldg. 4, Suite 200Palo Alto, CA 94306

Re: 180 Life Sciences Corp. Registration Statement on Form S-3 Filed May 9, 2025 File No. 333-287150

Dear Blair Jordan:

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 Lauren Hamill at 303-844-1008 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: David Loev