

DIVISION OF CORPORATION FINANCE

June 17, 2019

Amit Kumar President and Chief Executive Officer Anixa Biosciences, Inc 3150 Almaden Expressway, Suite 250 San Jose, CA 95118

> Re: Anixa Biosciences, Inc Registration Statement on Form S-3 Filed June 11, 2019 File No. 333-232067

Dear Dr. Kumar:

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 Ronald (Ron) Alper at 202-551-3329 with any questions.

Sincerely,

Division of Corporation Finance Office of Beverages, Apparel and Mining

cc: Barry Grossman