

January 22, 2025

Todd Usen
Chief Executive Officer
Adagio Medical Holdings, Inc.
26051 Merit Circle, Suite 102
Laguna Hills, CA 9265

Re: Adagio Medical Holdings, Inc.
Registration Statement on Form S-1
Filed January 14, 2025
File No. 333-284263

Dear Todd Usen:

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 Nicholas O'Leary at 202-551-4451 with any questions.

Sincerely,

Division of
Office of Industrial
Services

Corporation Finance

Applications and

cc: Michael Lee, Esq.