November 12, 2020

Nima M. Farzan President and Chief Executive Officer Kinnate Biopharma Inc. 11875 El Camino Real, Suite 101 San Diego, California 92130

Re: Kinnate Biopharma

Inc.

Amendment No. 2 to Draft Registration

Statement on Form S-1

Submitted November

3, 2020

CIK No. 0001797768

Dear Ms. Farzan:

We have reviewed your amended draft registration statement and have the following

comment. Please respond to this letter by providing the requested information and either

submitting an amended draft registration statement or publicly filing your registration statement

on EDGAR. If you do not believe our comment applies to your facts and circumstances or do

not believe an amendment is appropriate, please tell us why in your

After reviewing the information you provide in response to this comment and your

amended draft registration statement or filed registration statement, we may have additional

comments.

Amendment No. 2 to Draft Registration Statement on Form S-1

Certain Relationships and Related Party Transactions, page 180

We note your response to comment 1; however, as Item 404 requires disclosure for transactions since the beginning of the company's last fiscal year, including disclosure of the name of the related person and the basis on which the person is a related person, the identity of the beneficial owner or owners of Eschelman Ventures LLC who are related persons are required to

be disclosed, unless one of the exceptions in the Instructions

to Item 404(a) apply.

Please advise.

Nima M. Farzan

FirstName LastNameNima

Kinnate Biopharma Inc. M. Farzan

Comapany 12,

November NameKinnate

Biopharma Inc. 2020

November Page 2

12, 2020 Page 2

FirstName LastName

You may contact Julie Sherman at (202) 551-3640 or Angela Connell at (202) 551-

3426 if you have questions regarding the financial statements and related matters. Please contact

Abby Adams at (202) 551-6902 or Celeste Murphy at (202) 551-3257 with any other questions.

Sincerely,

Division of

Corporation Finance

Sciences cc: Tony Jeffries, Esq.