

November 13, 2020

**Via EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Life Sciences  
100 F Street, N.E.  
Washington, D.C. 20549

Attention: Abby Adams  
Celeste Murphy  
Julie Sherman  
Angela Connell

**Re: Kinnate Biopharma Inc.  
Amendment No. 2 to  
Draft Registration Statement on Form S-1  
Submitted November 3, 2020  
CIK No. 0001797768**

Ladies and Gentlemen:

On behalf of our client, Kinnate Biopharma Inc. (“**Kinnate**” or the “**Company**”), we submit this letter in response to comments from the staff (the “**Staff**”) of the Securities and Exchange Commission (the “**Commission**”) contained in its letter dated November 12, 2020, relating to the above referenced Amendment No. 2 to Draft Registration Statement on Form S-1 (the “**Registration Statement**”). We are concurrently filing via EDGAR a revised Registration Statement (the “**Revised Registration Statement**”).

In this letter, we have recited the comments from the Staff in italicized, bold type and have followed each comment with the Company’s response. Except for page references appearing in the headings and Staff comments below (which are references to the Registration Statement submitted on November 3, 2020), all page references herein correspond to the Revised Registration Statement.

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PALO ALTO    SAN DIEGO    SAN FRANCISCO    SEATTLE    SHANGHAI    WASHINGTON, DC    WILMINGTON, DE

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**Amendment No. 2 to Draft Registration Statement on Form S-1 Confidentially Submitted on November 3, 2020  
Certain Relationships and Related Party Transactions, page 180**

1. *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 Eshelman 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.*

In response to the Staff's comment, the Company has revised the disclosure on pages 183 and 184 of the Revised Registration Statement to include the requested information for Eshelman Ventures, LLC.

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Please direct any questions regarding the Company's responses or the revised draft of the Registration Statement to me at (650) 849-3223 or tjeffries@wsgr.com.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

/s/ Tony Jeffries

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Tony Jeffries

cc: Nima Farzan, Kinnate Biopharma Inc.  
Mark Meltz, Kinnate Biopharma Inc.  
Emad Fareed, KPMG LLP  
Jennifer Knapp, Wilson Sonsini Goodrich & Rosati, P.C.  
Charles Kim, Cooley LLP

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