

# Clover Health

5401 Mallory Lane, Suite 210  
Franklin, TN 37067

November 15, 2021

**VIA EDGAR**

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

Attn: J. Nolan McWilliams  
Justin Dobbie

**Re:** Clover Health Investments, Corp.  
Registration Statement on Form S-1  
File No. 333-261078  
REQUEST FOR ACCELERATION OF EFFECTIVENESS

**Acceleration Request**

Requested Date: November 17, 2021  
Requested Time: 4:30 p.m. Eastern Time

Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Clover Health Investments, Corp. (the "**Company**") hereby requests that the Securities and Exchange Commission (the "**Commission**") take appropriate action to declare the Company's Registration Statement on Form S-1 (File No. 333-261078) effective at the "Requested Date" and "Requested Time" set forth above or as soon thereafter as practicable.

The Company hereby authorizes Niki Fang, who is an attorney with the Company's outside legal counsel, Orrick, Herrington & Sutcliffe LLP, to orally modify or withdraw this request for acceleration.

The Company requests that it be notified of such effectiveness by a telephone call to Ms. Fang at (415) 773-5540.

*[Signature page follows]*

Sincerely,

Clover Health Investments, Corp.

By: /s/ Mark Herbers

Name: Mark Herbers

Title: Chief Financial Officer

Vivek Garipalli, Clover Health Investments, Corp

Andrew Toy, Clover Health Investments, Corp.

Gia Lee, Clover Health Investments, Corp.

Stephen Thau, Esq., Orrick, Herrington & Sutcliffe LLP

William L. Hughes, Esq., Orrick, Herrington & Sutcliffe LLP

Niki Fang, Esq., Orrick, Herrington & Sutcliffe LLP