

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

November 12, 2019

Gerri A. Henwood Chief Executive Officer Baudax Bio, Inc. 490 Lapp Road Malvern, PA 19355

> Re: Baudax Bio, Inc. Form 10-12B Filed October 22, 2019 File No. 001-39101

Dear Ms. Henwood:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Life Sciences