



DIVISION OF
CORPORATION FINANCE

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

November 5, 2019

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

**Re: Baudax Bio, Inc.
Draft Registration Statement on Form 10-12B
Exhibit Nos. 10.5, 10.8-10.10, 10.12 and 10.15-10.22
Submitted October 7, 2019
File No. 377-02707**

Dear Ms. Henwood:

We have concluded our assessment of your redacted exhibits for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance