

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

DIVISION OF CORPORATION FINANCE

November 22, 2024

Lawrence Klein Chief Executive Officer Oruka Therapeutics, Inc. 855 Oak Grove Avenue Suite 100 Menlo Park, CA 94025

> Re: Oruka Therapeutics, Inc. Registration Statement on Form S-1 Filed November 14, 2024 File No. 333-283212

Dear Lawrence Klein:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Jessica Dickerson at 202-551-8013 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Branden Berns, Esq.