December 19, 2022

Guo-Liang Yu Chief Executive Officer Apollomics Inc. 989 E. Hillsdale Blvd., Suite 220 Foster City, CA 94404

> Re: Apollomics Inc. Amendment No. 1 to

Registration Statement on Form F-4

Filed December 15,

2022

File No. 333-268525

Dear Guo-Liang Yu:

We have reviewed your amended registration statement and have the following

comments. In some of our comments, we may ask you to provide us with information so we

may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the

requested information. If you do not believe our comments apply to your facts and

circumstances or do not believe an amendment is appropriate, please tell us why in your

response.

After reviewing any amendment to your registration statement and the information you

provide in response to these comments, we may have additional comments.

Unless we note

otherwise, our references to prior comments are to comments in our December 5, 2022 letter.

Amendment No. 1 to Registration Statement on Form F-4

Information about Apollomics Drug Candidate Development Status, page 215

We note your revised disclosure in response to prior comment 6 and reissue in part. Please remove the third party trials from your pipeline table as disclosure indicates you do not have any direct financial interest in the development of these product candidates by third parties. We will not object to a narrative discussion of your rights to access clinical trial data and potential to benefit from feedback from regulators.

Guo-Liang Yu

FirstName

ApollomicsLastNameGuo-Liang Yu

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December NameApollomics

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Employment Agreements, page 337

Please file the employment agreements entered into with your executive officers as

exhibits to your registration statement. Refer to Item

601(b)(10)(ii)(A) of Regulation S-K

for guidance.

You may contact Christine Torney at 202-551-3652 or Kevin Vaughn at 202-551-3494 if

you have questions regarding comments on the financial statements and related matters. Please

contact Tyler Howes at 202-551-3370 or Christine Westbrook at 202-551-5019 with

any other questions.

Corporation Finance

Sciences cc: Daniel Nussen, Esq.

Sincerely, Division of Office of Life