Ren e Aguiar-Lucander Chief Executive Officer Calliditas Therapeutics AB Kungsbron 1, C8 SE-111 22 Stockholm, Sweden

> Re: Calliditas Therapeutics AB Amendment No. 2 to Draft Registration Statement on Form F-1 Submitted March 2, 2020 CIK No. 0001795579

Dear Ms. Aguiar-Lucander:

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 February 18, 2020 letter.

Amendment No. 2 to Draft Registration Statement on Form F-1

Budenofalk for Autoimmune Hepatitis, page 111

We note your response to comment 4 and agree that the relevant analysis is whether your

business is substantially dependent on the Falk agreement. Please provide us with a

detailed analysis supporting your believe that your plans to seek regulatory approval and

commercialize Budenfalk are not substantially dependent on your agreement with Dr.

Falk Pharma GmbH. Your analysis should address how you could commercialize

Budenofalk without in-licensing Budenofalk 3 mg oral capsules from Dr. Falk Pharma.

Additionally, to the extent your license with Dr. Falk Pharma permits you to use Dr. Falk

Pharma's clinical data for purposes of seeking orphan drug designation or FDA approval,

Ren e Aguiar-Lucander

Calliditas Therapeutics AB

March 6, 2020

Page 2

please explain how you would meet the requirements without Dr. Falk Pharma's clinical

data, and the additional time and expense you might incur in creating your own clinical

data for these purposes..

Calliditas Therapeutics AB and Subsidiaries

Notes to Consolidated Financial Statements

Note 6. Auditors' Fee, page F-21

You noted "Other Audit Activities" as "services in accordance with a 2. special agreement

on financial statements." Please describe to us specifically what these audit activities

relate to.

You may contact Sasha Parikh at 202-551-3627 or Lynn Dicker at 202-551-3616 if you

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

contact Tim Buchmiller at 202-551-3635 or Suzanne Hayes at 202-551-3675 with

any other

 ${\it questions.}$ 

FirstName LastNameRen e Aguiar-Lucander

Corporation Finance Comapany NameCalliditas Therapeutics AB

Sciences
March 6, 2020 Page 2
cc: Michael Rosenberg, Esq.
FirstName LastName

Sincerely,

Division of

Office of Life