

October 4, 2024

Daniel T. Scavilla  
President and Chief Executive Officer  
Globus Medical Inc.  
2560 General Armistead Avenue  
Audubon , Pennsylvania 19403-5214

Re: Globus Medical Inc.  
Form 10-K for Fiscal Year Ended December 31, 2023  
File No. 001-35621

Dear Daniel T. Scavilla :

We have completed our review of your filings. 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.

Corporation Finance  
Applications and

Sincerely,  
Division of  
Office of Industrial  
Services