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September 26, 2018

VIA EDGAR

Securities and Exchange Commission
Division of Corporation Finance
100 F. Street, N.E.
Washington, D.C. 20549

Attention: Craig Arakawa/Raj Rajan (Accounting)
David Link/ Michael Killoy (Legal)

Re: Osmotica Pharmaceuticals plc
Registration Statement on Form S-1
Filed September 14, 2018
File No. 333-227357

Ladies and Gentlemen:

This letter is being furnished on behalf of Osmotica Pharmaceuticals plc (the "Company"), with respect to the Company's Registration Statement on Form S-1 (File No. 333-227357) that was filed with the Securities and Exchange Commission (the "Commission") on September 14, 2018 (as may be further amended from time to time, the "Registration Statement") in connection with the initial public offering (the "IPO") of the Company's ordinary shares.

During a telephone call with representatives of the Company, the Company's independent auditor and Ropes & Gray LLP on September 26, 2018, the staff (the "Staff") of the Commission requested that the Company provide the Staff with certain supporting materials related to the tables that appear in the "Capitalization" and "Dilution" sections on pages 70-73 of the Registration Statement (the "Capitalization and Dilution Tables").

In response to the Staff's request, the Company is supplementally providing the Staff with the supporting documentation set forth in Exhibit A, which the Company used to prepare the Capitalization and Dilution Tables. In addition, the Company is supplementally providing the Staff with the proposed changed pages to the Registration Statement set forth in Exhibit B, which represent the Company's current estimates as to the amounts that will be included in the Capitalization and Dilution Tables.

* * * * *

We hope that the foregoing has been responsive to the Staff's request. If you have any questions about this information, or if there is any additional information that we might provide to assist the Staff's review, please contact the undersigned at (617) 951-7802.

Sincerely,

/s/ Craig E. Marcus
Craig E. Marcus

cc: Christopher Klein (Osmotica Pharmaceuticals plc)
William Michener (Ropes & Gray LLP)

Exhibit A

Osmotica Pharmaceuticals plc
Capitalization - Pro Forma
In Whole Dollars and Shares

Assumptions:

Base Offering 8,300,000
Greenshoe Percent 15.0%

Pre-IPO Shares 1,000,515
Reorganization Exchange Ratio 42.835079

Total Shares Pre-IPO 42,857,139
Shares Offered in IPO 8,300,000
Midpoint Pricing range \$ 15.00

Offering Size \$124,500,000
Underwriting Disc. 7.0% (8,715,000)
Estimated Expenses (4,529,464)

Net Proceeds \$111,255,536

Sources of Funds

Net Proceeds of Offering (from above) \$111,255,536

Total Sources \$111,255,536

Uses of Funds

Increase Cash \$11,255,536
Repay Term A Loan 50,250,000 *Partial Repayment*
Repay Term B Loan 49,750,000 *full repayment*

\$111,255,536

Osmotica Pharmaceuticals plc
Capitalization - Pro Forma
Pro-forma balance sheet - repayment as of June 30, 2018
Dollars and Shares In thousands

(\$ Thousands)	June 30, 2018	June 30, 2018	June 30, 2018	Source of PF Adjustments
	Actual - As reported	PF Adjustments	Pro-Forma As adjusted	
Cash	\$28,408	\$11,256	\$39,664	From Sources and Uses of Funds
Senior secured credit facility				
Term A Loan	273,657	(50,250)	223,407	From Sources and Uses of Funds
Term B Loan	49,750	(49,750)	-	From Sources and Uses of Funds
Total senior secured credit facilities	323,407	(100,000)	223,407	
Deferred financing fees	(6,150)	1,902	(4,248)	Def'd financing fees allocated to repaid debt
Total senior secured credit facilities, net of deferred financing fees	317,257	(98,098)	219,159	
Current portion of Long Term Debt	(6,724)	945	(5,779)	Current portion of LTD allocated to repaid debt
Senior secured credit facilities — long-term portion	310,533	(97,153)	213,380	
Note payable — insurance financing	780		780	
Total long-term indebtedness	311,313	(97,153)	214,160	
Total equity	\$419,592	\$109,807	\$529,399	IPO Proceeds less after tax deferred finance fee write-off

Calculation of Pro-Forma Equity

	Post Reorg/Pre IPO	Post IPO	IPO Shares
Ordinary Shares	42,857	51,157	8,300
Nominal Value (in whole dollars)	\$0.01	\$0.01	\$0.01
Ordinary Shares Nominal Value	\$429	\$512	\$83
Partners Capital (pre-reorganization)	\$421,316		
Less: Ordinary Shares Nominal Value	(429)		
Post-Reorg Additional Paid-In Capital	\$420,887	\$420,887	
IPO Net Proceeds (Net of \$83 nominal value of IPO Shares)		111,173	
Deferred Finance Fee Write-Off (after tax)		(1,449)	
Pro-Forma Additional Paid In Capital		\$530,611	

From Calculation of Pro-Forma Equity Above

	June 30, 2018	June 30, 2018	June 30, 2018
	Actual - As reported	Pro-Forma	Pro-Forma As Adjusted
Partners Capital	\$421,316	-	-
Ordinary Shares Nominal Value		429	512
Additional Paid-In Capital		420,887	530,611
Retained Earnings	-	-	-
Accumulated other comprehensive loss	(1,724)	(1,724)	(1,724)
	\$419,592	\$419,592	\$529,399

Osmotica Pharmaceuticals plc

Dilution

In Whole Dollars and Shares

	Calculation References	Mid-point	Sensitivity		Greenshoe
Assumed initial public offering price per share		\$ 15.00	\$ 16.00	\$ 14.00	\$ 15.00
Net tangible book value per share at June 30, 2018	A/D	(6.68)	(6.68)	(6.68)	(6.68)
Increase per share attributable to new investors in this offering		1.34	1.49	1.19	1.80
Pro forma net tangible book value per share after this offering	(A-C)/(D+E)	(5.34)	(5.18)	(5.49)	(4.88)
Dilution per share to new investors		\$ 20.34	\$ 21.18	\$ 19.49	\$ 19.88
Increase/ decrease			(0.15)	0.15	
Supporting calculations					
Tangible book value					
Total net book value at June 30, 2018		\$ 419,592,101	From Financial Statements (Assets - Liabilities)		
Less:					
Goodwill		152,815,716	From Financial Statements		
Intangibles, net		546,713,905	From Financial Statements		
Deferred finance costs		6,149,564	From Financial Statements Footnote 8		
Tangible book value at June 30, 2018	A	\$ (286,087,084)	From Financial Statements		
Number of shares issued and outstanding at June 30, 2018 pre-reorganization		1,000,515	From Financial Statements		
Reorganization Exchange Ratio		42.835079			
Number of shares issued and outstanding at June 30, 2018 - post reorganization	D	42,857,139			
Assumed initial public offering price per share		\$ 15.00	\$ 16.00	\$ 14.00	\$ 15.00
Number of shares offered in IPO	E	8,300,000	8,300,000	8,300,000	9,545,000
Expected IPO proceeds - gross		\$ 124,500,000	\$ 132,800,000	\$ 116,200,000	\$ 143,175,000
Less:					
Underwriting Discount	7.0%	(8,715,000)	(9,296,000)	(8,134,000)	(10,022,250)
Estimated Expenses		(4,529,464)	(4,529,464)	(4,529,464)	(4,529,464)
Expected IPO proceeds, net	B	\$ 111,255,536	\$ 118,974,536	\$ 103,536,536	\$ 128,623,286
Application of net proceeds of the offering - repayment of debt					
Debt repayment	B	\$ (100,000,000)	\$ (100,000,000)	\$ (100,000,000)	\$ (100,000,000)
Decrease of deferred financing costs	B	1,902,000	1,902,000	1,902,000	1,902,000
Net increase in tangible book value due to the offering	Σ B=C	\$ 13,157,536	\$ 20,876,536	\$ 5,438,536	\$ 30,525,286
Net tangible book value - post IPO	A-C	(272,929,548)	(265,210,548)	(280,648,548)	(255,561,798)
Increase/ decrease			(7,719,000)	7,719,000	
Total number of shares - post IPO	D+E	\$ 51,157,139	\$ 51,157,139	\$ 51,157,139	\$ 52,402,139