

Roth Capital Partners, LLC  
888 San Clemente Drive, Suite 400  
Newport Beach, CA 92660

July 28, 2020

**VIA EDGAR CORRESPONDENCE**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Joshua Samples

**Re: Fathom Holdings, Inc.  
Amendment No. 4 to Registration Statement on Form S-1  
File No. 333-235972**

Dear Mr. Samples:

Pursuant to Rule 461 of the General Rules and Regulations under the Securities Act of 1933, as amended (the "Act"), we, the undersigned underwriter, hereby request that the Securities and Exchange Commission (the "Commission") take appropriate action to cause the above-referenced registration statement on Form S-1 (the "Registration Statement") to become effective at 5:00 p.m., Eastern time, on Thursday, July 30, 2020, or as soon thereafter as practicable.

Pursuant to Rule 460 under the Act, we wish to advise you that we have distributed as many copies of the Preliminary Prospectus dated as of the date hereof to dealers, institutions and others as appears to be reasonable to secure adequate distribution of the preliminary prospectus.

We have complied and will comply with Rule 15c2-8 under the Securities Exchange Act of 1934, as amended.

Very truly yours,

ROTH CAPITAL PARTNERS, LLC

By: /s/ Aaron M. Gurewitz  
Aaron M. Gurewitz  
Head of Equity Capital Markets

cc: M. Ali Panjwani, Esq.  
Pryor Cashman LLP

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