

September 25, 2025

John Rood
Chief Executive Officer
Momentum Inc.
3901 N. First Street
San Jose, California 95134

Re: Momentum Inc.
Registration Statement on Form S-3
Filed on September 22, 2025
File No. 333-290425

Dear John Rood:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Bradley Ecker at 202-551-4985 with any questions.

Sincerely,

Division of

Office of

Corporation Finance

Manufacturing