



November 16, 2022

Securities and Exchange Commission
Division of Corporation Finance
Office of Technology
100 F Street, N.E.
Washington, DC 20549
Attn: Ms. Melissa Kindelan
Ms. Kathleen Collins

RE: CarGurus, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2021
Filed February 25, 2022
Form 10-Q for the Quarterly Period Ended June 30, 2022
Filed August 8, 2022
Form 8-K Furnished August 8, 2022
File No. 001-38233

Dear Ms. Kindelan and Ms. Collins:

On behalf of CarGurus, Inc. (the "Company"), we are respectfully requesting an extension regarding the proposed date to file the Company's response to the comment letter dated November 10, 2022 (the "Comment Letter") from the Staff of the Securities and Exchange Commission regarding the above referenced filings by the Company. In accordance with our recent conversations, the Company expects to provide its response to the Comment Letter no later than December 9, 2022.

Thank you for your consideration of our request. Please call me at (617) 354-0068 should you have any questions or require further information.

Sincerely,

/s/ Javier Zamora

Javier Zamora
General Counsel and Corporate Secretary

cc: Jason Trevisan, CarGurus, Inc., Chief Executive Officer
Laurie Cerveney, Morgan, Lewis & Bockius LLP
