

September 10, 2024

Verender Badial
Chief Financial Officer
Zura Bio Limited
1489 W. Warm Springs Rd. #110
Henderson, NV 89014

Re: Zura Bio Limited
Registration Statement on Form S-3
Filed September 3, 2024
File No. 333-281905

Dear Verender Badial:

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 Jessica Dickerson at 202-551-8013 with any questions.

Sincerely,

Division of

Office of Life

Corporation Finance

Sciences

cc: Sarah Sellers, Esq.