

July 20, 2021

**VIA EDGAR TRANSMISSION AND FEDEX**

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

Attention: Mr. Nicholas Lamparski  
Ms. Mara Ramson

**Re: Xponential Fitness, Inc.  
Registration Statement on Form S-1  
Registration No. 333-257443**

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, we hereby request acceleration of the effective date of the Registration Statement on Form S-1 (File No. 333-257443) (the "**Registration Statement**") of Xponential Fitness, Inc. (the "**Company**"). We respectfully request that the Registration Statement become effective as of 4:00 P.M. Eastern Time on July 22, 2021, or as soon as practicable thereafter, or at such other time as our legal counsel, Davis Polk & Wardwell LLP, may request by a telephone call to the staff of the U.S. Securities and Exchange Commission. Once the Registration Statement has been declared effective, please orally confirm that event with our counsel, Davis Polk & Wardwell LLP, by calling Alan F. Denenberg at (650) 752-2004.

Very truly yours,

**Xponential Fitness, Inc.**

By: /s/ Anthony Geisler

Name: Anthony Geisler  
Title: Chief Executive Officer