

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

November 13, 2023

Jordan Plews, Ph.D. Chief Executive Officer Elevai Labs Inc. 120 Newport Center Drive, Ste. 250 Newport Beach, CA 92660

Re: Elevai Labs, Inc.

Registration Statement on Form S-1

Exhibit Nos. 10.6 and 10.7 Filed September 29, 2023 File No. 333-274755

Dear Jordan Plews:

We have concluded our assessment of your redacted exhibits for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance

cc: Tim Dockery, Esq.