

Holicy Inc.
2300 Carillon Point
Kirkland, WA 98033

August 3, 2020

VIA EDGAR

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

Re: Holicy Inc.
Registration Statement on Form S-1
Filed July 17, 2020, as amended
File No. 333-239926

Dear Mr. Ingram:

Pursuant to Rule 461 of the rules and regulations promulgated under the Securities Act of 1933, as amended, Holicy Inc. respectfully requests that the effective date of the above-referenced Registration Statement be accelerated so as to permit it to become effective at 4:00 p.m. Washington D.C. time on August 4, 2020, or as soon thereafter as practicable.

Please call David A. Sakowitz of Winston & Strawn LLP at (212) 294-2369 to provide notice of the effectiveness of the Registration Statement.

[Signature Page Follows]

Very truly yours,

Holicy Inc.

By: /s/ Steve Ednie
Name: Steve Ednie
Title: Chief Financial Officer

cc: David A. Sakowitz, Winston & Strawn LLP