

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3233

October 3, 2017

<u>Via E-mail</u> La Quinta Holdings Inc. Mark M. Chloupek Executive Vice President, Secretary and General Counsel 909 Hidden Ridge, Suite 600 Irving, Texas 75038

> Re: La Quinta Holdings Inc. Form 10-K for the fiscal year ended December 31, 2016 Filed March 1, 2017 File No. 1-36412

> > Form 8-K Filed July 26, 2017 File No. 1-36412

Dear Mr. Chloupek:

We have reviewed your September 6, 2017 response to our comment letter and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to our comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to our comments, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our August 23, 2017 letter.

Form 8-K filed July 26, 2017

## <u>Exhibit 99.1</u>

1. We note your response to comment 2. It appears that this non-GAAP information also includes pro forma information. To the extent you include pro forma information in a future Form 8-K, please confirm that such information will comply with Article 11 of Regulation S-X.

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2. We note your response to comment 3 and that CorePoint Lodging will update the proforma financial statements for the debt refinancing. Please clarify for us if such proforma adjustments will result in the CorePoint Lodging proforma financial statements reflecting only the portion of the refinanced debt that will be carried by CorePoint Lodging, or all the refinanced debt, including the portion that will be carried by New La Quinta after the spin transaction. We may have further comment.

You may contact Howard Efron, Staff Accountant, at (202) 551-3439 or me at (202) 551-3295 with any questions.

Sincerely,

/s/ Jennifer Monick

Jennifer Monick Assistant Chief Accountant Office of Real Estate and Commodities

Cc: Edgar Lewandowski, Esq.