



DIVISION OF  
CORPORATION FINANCE

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

April 12, 2023

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

James Francis  
Chief Executive Officer  
ESH Acquisition Corp.  
228 Park Ave S, Suite 89898  
New York, New York 10003-1502

**Re: ESH Acquisition Corp.  
Registration Statement on Form S-1  
Filed May 26, 2022  
File No. 333-265226**

Dear James Francis:

It has been more than nine months since you filed this registration statement and it is now out of date. Within 30 days from the date of this letter, you should either:

- amend it to comply with the applicable requirements of the Securities Act of 1933, the rules and regulations under the Act, and the requirements of the form; or
- file a request for withdrawal.

If you requested confidential treatment for portions of any exhibits to your registration statement and you request withdrawal of that registration statement, please submit a concurrent request for withdrawal of your application for confidential treatment.

If you do not amend the registration statement or file a request for withdrawal (or provide us with a satisfactory explanation of why you have not done either) within 30 days, we may enter an order declaring the registration statement abandoned under rule 479 of the Act.

James Francis  
ESH Acquisition Corp.  
April 12, 2023  
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Please contact Catherine De Lorenzo at 202-551-4079 or Ruairi Regan at 202-551-3269 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction