



flyExclusive, Inc.
2860 Jetport Road
Kinston, NC 28504

December 18, 2025

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Energy & Transportation
100 F Street, N.E.
Washington, D.C. 20549
Attention: Michael Purcell

Re: Acceleration Request
flyExclusive, Inc.
Registration Statement on Form S-3
Filed December 17, 2025
(File No. 333-290828)

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended (the "Act"), flyExclusive, Inc. (the "Registrant") hereby requests that the U.S. Securities and Exchange Commission (the "Commission") take appropriate action to accelerate the effective date of the above-referenced registration statement (the "Registration Statement") so as to become effective on December 19, 2025 at 4:15 p.m. Eastern Time, or as soon thereafter as practicable.

The Registrant hereby authorizes Donald R. Reynolds, Alexander M. Donaldson, Nicholas C. Massey, and/or Christopher P. Agoranos of Wyrick Robbins Yates & Ponton LLP to orally modify or withdraw this request for acceleration.

Once the Registration Statement is effective, please orally confirm the event with our counsel, Wyrick Robbins Yates & Ponton LLP, by calling Donald R. Reynolds at (919) 865-2805. We also respectfully request that a copy of the written order from the Commission verifying the effective date and time of the Registration Statement be sent to Mr. Reynolds via email at dreynolds@wyrick.com.

Very truly yours,

FLYEXCLUSIVE, INC.

By: /s/ Thomas James
Segrave, Jr.
Thomas James
Segrave, Jr.
Chief Executive
Officer and Chairman

cc: Donald R. Reynolds, Wyrick Robbins Yates & Ponton LLP
