

September 8, 2022

Tom McHugh
Chief Financial Officer
Avadel Pharmaceuticals PLC
16640 Chesterfield Grove, Suite 200 Road
Chesterfield, MO 63005

Pharmaceuticals PLC
Statement on Form S-3
2022

Re: Avadel
Registration
Filed August 31,
File No. 333-267198

Dear Mr. McHugh:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Stacey Gama at 202-551-3188 with any questions.

Please contact Doris

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc:

Finn Murphy, Esq.