July 25, 2023

Iain Brown Chief Financial Officer Mural Oncology Ltd 10 Earlsfort Terrace Dublin 2, D02 T380, Ireland

> Re: Mural Oncology Ltd Amendment No. 2 to Draft Registration

Statement on Form 10

Submitted July 14,

2023

CIK No. 0001971543

Dear Iain Brown:

We have reviewed your amended draft registration statement 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 this letter by providing the requested information and either submitting

an amended draft registration statement or publicly filing your registration statement on

EDGAR. If you do not believe our comments apply to your facts and circumstances or do not

believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to these comments and your

amended draft registration statement or filed registration statement, we may have additional

comments.

Amendment No. 2 to Registration Statement on Form 10 as Confidentially Submitted on July 14, 2023

Business, page 105

We note your response to prior comment 6, which we reissue in part. There are still numerous instances throughout the Information Statement where information presented in your tables and figures appears to be printed in type that is too small to read. Even with enhanced pixilation, such text is not legible. Please revise to ensure any included figures and graphics can be read. By way of example only and not limitation, we note the

following:

leftmost blue columns and in the "Indication" and "Dosing" columns of Iain Brown

Mural Oncology Ltd

July 25, 2023

Page 2

your pipeline overview and discovery programs tables on page 112 Text related to Part C in the dose expansion figure on page 116 Line items on the  $\boldsymbol{x}$  and  $\boldsymbol{y}$  axes in many of your tables, such as on pages 120 and 121.

Safety Observations, page 122

We note your response to to prior comment 11 and the distinction between the severity of

adverse events as graded by the CTCAE and as defined by the FDA. Please disclose all

serious adverse events observed in ARTISTRY-1 meeting the FDA definition and

quantify the number of each type of event.

3. You disclose that Alkermes in its sole discretion may waive any of the listed conditions to

 $\,$  the distribution, including that Alkermes shall have received a private letter ruling from

the IRS and a tax opinion from Goodwin Procter LLP. If Alkermes waives

such condition and the changes, such as those resulting from different

consequences, would be material to Alkermes' shareholders, please tell us how such

changes will be communicated to shareholders.

Voting, page 192

thereto.

any

tax

4. We note your revisions in response to prior comment 14. We also note your reference to

your Constitution and your response letter's reference to Regulation 96 of your

Constitution.

Please file your articles and bylaws or instruments corresponding

Additionally, your disclosure is not clear as to when voting is decided on a show of

hands if all resolutions put to a vote of a general meeting of shareholders are to be

decided on a poll. Please clarify when a show of hands may or will determine the

vote. For example, will a show of hands determine the vote of a resolution at a  $\ensuremath{\mathsf{a}}$ 

special meeting, for other questions that arise at a meeting for which a poll is not

demanded, or any other circumstances?

FirstName LastNameIain Brown

 $\label{eq:please} \mbox{ Please incorporate risk factor disclosure describing the limitations on shareholder} \\ \mbox{ Comapany voting}$ 

NameMural

rightsOncology Ltd show of hands voting can be used.
in cases where

July 25, 2023 Page 2

FirstName LastName

Iain Brown

FirstName LastNameIain Brown

Mural Oncology Ltd

Comapany

July NameMural Oncology Ltd

25, 2023

July 25,

Page 3 2023 Page 3

FirstName LastName

You may contact Frank Wyman at 202-551-3660 or Vanessa Robertson at 202-551-3649

if you have questions regarding comments on the financial statements and  ${\tt related}$ 

matters. Please contact Lauren Hamill at 303-844-1008 or Suzanne Hayes at 202-551-3675 with

any other questions.

Sincerely,

Division of Corporation

Finance

Office of Life Sciences

cc: Robert E. Puopolo