

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

Mail Stop 3561

June 14, 2017

Mr. Sunil M. Doshi Chief Financial Officer Zoe's Kitchen, Inc. 5760 State Highway 121 Suite 250 Plano, Texas 75024

Re: Zoe's Kitchen, Inc.

Form 10-K for the Year Ended December 26, 2016

Filed February 23, 2017 File No. 001-36411

Dear Mr. Doshi:

We have completed our review of your filings. 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.

Sincerely,

/s/ Melissa Raminpour

Melissa Raminpour Branch Chief Office of Transportation and Leisure