



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

DIVISION OF  
CORPORATION FINANCE

November 14, 2022

Daniel H. Schulman  
President, Chief Executive Officer and Director  
PayPal Holdings, Inc.  
2211 North First Street  
San Jose, CA 95131

**Re: PayPal Holdings, Inc.**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed April 19, 2022**  
**File No. 001-36859**

Dear Daniel H. Schulman:

We have completed our review of your filing. 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,

Division of Corporation Finance  
Disclosure Review Program