

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
December 4, 2019**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**Pivotal Software, Inc.**

**File No. 005-90452 - CF#37528**

---

VMware, Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from an exhibit to a Schedule 13E-3 filed on November 4, 2019 relating to the acquisition of Pivotal Software, Inc. by VMware, Inc.

Based on representations by VMware, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit (c)(9)                      through November 4, 2029

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Vanessa Countryman  
Secretary