

**GitLab Inc.**

October 12, 2021

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Technology  
100 F Street, NE  
Washington, DC 20549

Attention: Jeff Kauten  
Larry Spigel  
Lisa Etheredge  
Robert Littlepage

**Re: GitLab Inc.**  
**Registration Statement on Form S-1 (File No. 333-259602) originally filed September 17, 2021, as amended,**  
**and corresponding Registration Statement on Form 8-A (File No. 001-40895) filed October 8, 2021**  
**Requested Date: October 13, 2021**  
**Requested Time: 4:00 PM Eastern Time**

Ladies and Gentlemen:

GitLab Inc. (the “Registrant”) hereby requests that the Securities and Exchange Commission take appropriate action to declare the above-captioned Registration Statements on Form S-1 and Form 8-A effective at the “Requested Date” and “Requested Time” set forth above or as soon thereafter as practicable. The Registrant hereby authorizes Ran Ben-Tzur or Aman Singh, both of whom are attorneys with the Registrant’s outside legal counsel, Fenwick & West LLP, to orally modify or withdraw this request for acceleration. The Registrant requests that it be notified of such effectiveness by a telephone call to Mr. Ben-Tzur at (650) 335-7613 or, in his absence, Mr. Singh at (212) 430-2767.

Sincerely,  
**GITLAB INC.**

/s/ Sytse Sijbrandij

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Sytse Sijbrandij

Chief Executive Officer

Cc: Brian Robins, Chief Financial Officer  
Robin J. Schulman, Chief Legal Officer and Corporate Secretary

**GitLab Inc.**

Cynthia Hess, Esq.

James Evans, Esq.

Ran Ben-Tzur, Esq.

Aman Singh, Esq.

Ryan Mittenness, Esq.

**Fenwick & West LLP**