



DIVISION OF  
CORPORATION FINANCE

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

July 28, 2025

Toby Hong Xu  
Chief Financial Officer  
Alibaba Group Holding Ltd  
26/F Tower One, Times Square  
1 Matheson Street, Causeway Bay  
Hong Kong  
People's Republic of China

**Re: Alibaba Group Holding Ltd**  
**Registration Statement on Form F-4**  
**Filed July 21, 2025**  
**File No. 333-288794**

Dear Toby Hong Xu:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Brian Fetterolf at 202-551-6613 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: Bruce Sun