

January 19, 2022

Nikesh Arora
Chief Executive Officer
Palo Alto Networks, Inc.
3000 Tannery Way
Santa Clara, CA 95054

Inc.

Fiscal Year Ended July 31, 2021

Re: Palo Alto Networks,
Form 10-K for
File No. 001-35594

Dear Mr. Arora:

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

Office of Technology

cc:

Jose F. Macias