



DIVISION OF  
CORPORATION FINANCE

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

July 8, 2020

Christopher Stone  
Vice President and General Counsel  
PDL BioPharma, Inc.  
932 Southwood Boulevard  
Incline Village, Nevada 89451

**Re: PDL BioPharma, Inc.**  
**Preliminary Proxy Statement on Schedule 14A**  
**Filed May 5, 2020**  
**File No. 000-19756**

Dear Mr. Stone:

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 Life Sciences

cc: Jacob D. Steele