

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

January 29, 2025

Robin Schulman Chief Legal Officer GitLab Inc. 268 Bush Street, #350 San Francisco, CA 94104

Re: GitLab Inc.

Form 10-K for the Fiscal Year Ended January 31, 2024

File No. 001-40895

Dear Robin Schulman:

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