

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

**April 18, 2011**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**Urban Outfitters, Inc.**

**File No. 000-22754 - CF# 26612**

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Urban Outfitters, Inc. submitted an application under Rule 24b-2 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on June 8, 2010.

Based on representations by Urban Outfitters, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibits will not be released to the public for the time period specified:

|              |                        |
|--------------|------------------------|
| Exhibit 10.1 | through April 25, 2011 |
| Exhibit 10.2 | through April 25, 2011 |
| Exhibit 10.3 | through April 25, 2011 |

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Pamela Howell  
Special Counsel