UNITED STATES SECURITIES AND EXCHANGE COMMISSION April 5, 2010

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

XOMA Ltd.

File No. 000-14710 - CF# 24188

XOMA Ltd. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-Q/A filed on September 11, 2008, as amended on March 5, 2010.

Based on representations by XOMA Ltd. 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 exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.37 through May 9, 2013

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

Daniel S. Greenspan Special Counsel