

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
October 26, 2015**

**ORDER GRANTING CONFIDENTIAL TREATMENT
UNDER THE SECURITIES ACT OF 1933 AND
THE SECURITIES EXCHANGE ACT OF 1934**

**KAR Auction Services, Inc.
ADESA Inc.**

File Nos. 333-113499, 333-148847, 001-32198 and 001-34568

CF#32790

KAR Auction Services, Inc., on its own behalf and on behalf of ADESA, Inc., its wholly-owned subsidiary, submitted an application under Rule 406 and Rule 24b-2 requesting confidential treatment for and extensions of multiple previous grants of confidential treatment for information excluded from the exhibits to the filings listed below.

Based on representations by KAR Auction Services, 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 | to Form | File No. | Filed on | Confidential Treatment Granted Through |
|----------------|----------------|-----------------|-------------------|---|
| 10.24 | S-1 | 333-113499 | May 26, 2004 | June 29, 2018 |
| 10.6 | 10-Q | 1-32198 | August 6, 2004 | June 29, 2018 |
| 10.34 | 10-Q | 1-32198 | November 9, 2005 | June 29, 2018 |
| 10.37 | 10-Q | 1-32198 | May 10, 2006 | June 29, 2018 |
| 10.6 | 10-Q | 1-32198 | November 8, 2006 | June 29, 2018 |
| 10.24 | 10-K | 1-32198 | February 28, 2007 | June 29, 2018 |
| 10.30 | 10-K | 1-32198 | February 28, 2007 | June 29, 2018 |
| 10.32 | S-4 | 333-148847 | January 25, 2008 | June 29, 2018 |
| 10.35 | S-4 | 333-148847 | January 25, 2008 | June 29, 2018 |
| 10.36 | S-4 | 333-148847 | January 25, 2008 | June 29, 2018 |
| 10.59 | 10-K | 333-148847 | March 11, 2009 | June 29, 2018 |
| 10.35 | 10-K | 1-34568 | February 25, 2010 | June 29, 2018 |
| 10.20 | 10-Q | 1-34568 | August 9, 2011 | June 29, 2018 |
| 10.22 | 10-Q | 1-34568 | August 9, 2011 | June 29, 2018 |
| 10.20c | 10-K | 1-34568 | February 28, 2012 | June 29, 2018 |

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KAR Auction Services, Inc., ADESA, Inc.

| Exhibit | to Form | File No. | Filed on | Confidential Treatment Granted Through |
|----------------|----------------|-----------------|-------------------|---|
| 10.38 | 10-Q | 1-34568 | May 8, 2012 | June 29, 2018 |
| 10.39 | 10-Q | 1-34568 | May 8, 2012 | June 29, 2018 |
| 10.20d | 10-Q | 1-34568 | August 7, 2012 | June 29, 2018 |
| 10.21b | 10-Q | 1-34568 | November 7, 2012 | June 29, 2018 |
| 10.19c | 10-Q | 1-34568 | May 2, 2013 | June 29, 2018 |
| 10.18 | 10-Q | 1-34568 | August 6, 2013 | June 29, 2018 |
| 10.19 | 10-Q | 1-34568 | August 6, 2013 | June 29, 2018 |
| 10.18b | 10-K | 1-34568 | February 19, 2014 | June 29, 2018 |
| 10.19b | 10-K | 1-34568 | February 19, 2014 | June 29, 2018 |
| 10.13d | 10-K | 1-34568 | February 18, 2015 | June 29, 2018 |
| 10.13 | 10-Q | 1-34568 | August 4, 2015 | June 29, 2018 |
| 10.14 | 10-Q | 1-34568 | August 4, 2015 | June 29, 2018 |

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

Brent J. Fields
Secretary