

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
July 28, 2009**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES ACT OF 1933**

**HD Supply, Inc.**

**File No. 333-159809 - CF# 23857**

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HD Supply, Inc. submitted an application under Rule 406 requesting confidential treatment for information it excluded from the Exhibit to Amendment No. 1 to a Form S-4 filed on July 10, 2009, as amended.

Based on representations by HD Supply, 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 exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.38                      through January 31, 2015

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

Ellie Bavaria  
Special Counsel