



DIVISION OF  
CORPORATION FINANCE

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

April 16, 2025

Joseph J. Wolk  
Chief Financial Officer  
JOHNSON & JOHNSON  
One Johnson & Johnson Plaza  
New Brunswick, New Jersey 08933

**Re: JOHNSON & JOHNSON**  
**Form 10-K for Fiscal Year Ended December 29, 2024**  
**File No. 001-03215**

Dear Joseph J. Wolk:

We have reviewed your filing and have the following comment.

Please respond to this letter within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe a comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this letter, we may have additional comments.

Form 10-K for Fiscal Year Ended December 29, 2024

Item 1. Business, page 1

1. We note your statement on page 3 indicating that the licensed patents related to your Darzalex and Darzalex Faspro products are material to your business. In future filings, please revise to disclose the material terms of your licensing agreement with Genmab A/S relating to your Darzalex and Darzalex Faspro products or tell us why you believe such disclosure is not required. Your revisions should include the aggregate amount paid to Genmab, royalty rates or royalty rate ranges, and term and termination provisions. Please also file this agreement as an exhibit to your annual report. Refer to Item 601 of Regulation S-K for guidance.

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.

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Please contact Eric Atallah at 202-551-3663 or Daniel Gordon at 202-551-3486 if you have questions regarding comments on the financial statements and related matters. Please contact Tyler Howes at 202-551-3370 or Chris Edwards at 202-551-6761 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences