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LATHAM & WATKINS LLP

2520172650006

August 18, 2017

**VIA CERTIFIED MAIL - -
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U.S. Department of Labor
Employee Benefits Security Administration
Top Hat Plan Exemption
200 Constitution Avenue, NW, N-1515
Washington, DC 20210

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File No. 000964-0343

Dear Sir or Madam:

Pursuant to ERISA Reg. Section 2520.104-23, we submit this letter on behalf of our client, Avery Dennison Corporation (the "Company"), to satisfy the alternate method of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") for an unfunded pension plan of the Company.

The Company maintains the Avery Dennison Corporation Key Executive Change of Control Severance Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The benefits under the Plan are paid as needed from the general assets of the Company.

The Company is located at 207 Goode Avenue, Glendale, California 91203 and its employer identification number is 95-1492269. Currently, there are 10 employees who are participants under the Plan.

As required by ERISA Section 104(a)(1), upon request we will provide the Department of Labor with a copy of the Plan.

Sincerely,



Sandhya Chandrasekhar

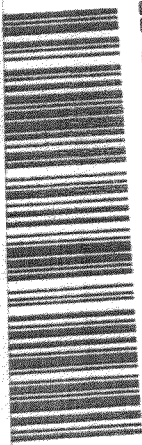
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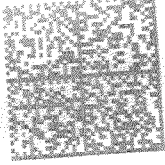
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