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September 8, 2011

**FILED VIA EDGAR; ORIGINAL SENT VIA UPS**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, NE  
Washington, DC 20549  
Attention: John Reynolds  
Assistant Director

Re: Avery Dennison Corporation  
Form 10-K for Fiscal Year Ended January 1, 2011  
Filed February 28, 2011;  
DEF 14A for Annual Meeting on April 28, 2011  
Filed March 17, 2011  
File No. 001-7685

Ladies and Gentlemen:

We confirm receipt of the letter dated August 22, 2011 from the staff of the Securities and Exchange Commission (the "Staff") with respect to the above-referenced filings. We have commenced obtaining information in preparation for a response to the Staff's letter, but will need additional time beyond the ten business-day period referred to in the letter to prepare an appropriate response. Accordingly, we respectfully advise the Staff that we currently expect to submit our response on or before September 30, 2011. We have been advised by Erin Wilson, examiner, that this extension has been approved by the Director.

Please do not hesitate to contact me at (626) 304-2180 if you have any questions or need additional information.

Sincerely,

/s/ Vikas Arora

Vikas Arora  
Vice President, Assistant General Counsel and  
Assistant Secretary

cc: Dean A. Scarborough  
Susan C. Miller  
Scott Hodgkins, Latham & Watkins LLP