

Mail Stop 3561

February 25, 2008

*By U.S. Mail and facsimile to (317) 808-6794*

Mark C. Kanaly  
Alston & Bird LLP  
One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424

**Re: Duke Realty Corp.  
Definitive 14A  
Filed March 15, 2007  
File No. 1-09044**

Dear Mr. Kanaly:

We have reviewed your December 21, 2007 response to our comments of December 3, 2007. Without more detail, we cannot agree or disagree with your conclusion that you have an appropriate basis to omit the identified performance targets. Since you are in possession of all of the facts related to your disclosure, we have decided that we have no basis to disagree with your decision to omit this information from your filing. As in all cases, we remind you that you are responsible for the adequacy and accuracy of the disclosure in your filings. We do not have any further comments on your filing.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3357.

Sincerely,

Pam Howell  
Special Counsel