

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

Administrative Proceedings Rulings  
Release No. 5157 / October 11, 2017

Administrative Proceeding  
File No. 3-18202

In the Matter of

**Penny Auction Solutions, Inc.,  
Sebring Software, Inc., and  
Studio II Brands, Inc.**

**Order to Show Cause**

On September 22, 2017, the Securities and Exchange Commission issued an order instituting proceedings (OIP) against Respondents under Section 12(j) of the Securities Exchange Act of 1934.

I previously found that Respondents were served with the OIP by September 26, 2017, and their answers were due by October 10, 2017. *Penny Auction Sols., Inc.*, Admin. Proc. Rulings Release No. 5146, 2017 SEC LEXIS 3214 (ALJ Oct. 6, 2017). To date, no Respondent has answered.

I ORDER that by October 23, 2017, Respondents shall SHOW CAUSE why the registration of their securities should not be revoked by default due to their failure to file answers or otherwise defend this proceeding. If Respondents fail to respond to this order, attend the prehearing conference scheduled for October 24, 2017, at 2:00 p.m. EDT, or otherwise defend the proceeding, they will be deemed in default and the registrations of their securities will be revoked. OIP at 3; 17 C.F.R. §§ 201.155(a)(1)-(2), .220(f), .221(f).

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James E. Grimes  
Administrative Law Judge