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

ADMINISTRATIVE PROCEEDINGS RULINGS Release No. 2040/November 21, 2014

ADMINISTRATIVE PROCEEDING
File No. 3-16130

In the Matter of

SEAN C. COOPER

ORDER REGARDING APPLICATION TO QUASH SUBPOENA

On September 17, 2014, the Securities and Exchange Commission issued an Order Instituting Proceedings against Respondent pursuant to Sections 203(f) and (k) of the Investment Advisers Act of 1940 and Section 9(b) of the Investment Company Act of 1940.

On November 13, 2014, this Office received a Motion to Quash Subpoena to Third Party WestEnd Capital Management LLC (WestEnd) for Production of Documentary Evidence (Motion). WestEnd argues that the subpoena requests are irrelevant, overbroad, duplicative, and request private financial information. On November 20, 2014, Respondent filed an Opposition to the Motion.

Accordingly, it is ORDERED that compliance with the subpoena is SUSPENDED pending resolution of the Motion. WestEnd shall have until Tuesday, November 25, 2014, to file a reply brief, but should inform this Office promptly, via email to alj@sec.gov, if it does not plan to file one.

Jason S. Patil
Administrative Law Judge