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

ADMINISTRATIVE PROCEEDINGS RULINGS Release No. 2287 / February 5, 2015

ADMINISTRATIVE PROCEEDING File No. 3-16223

In the Matter of

SANDS BROTHERS ASSET MANAGEMENT, LLC, STEVEN SANDS, MARTIN SANDS, AND CHRISTOPHER KELLY **ORDER**

The Securities and Exchange Commission commenced this proceeding on October 29, 2014, with an Order Instituting Administrative and Cease-and-Desist Proceedings against Respondents. The Division of Enforcement and Respondent Christopher Kelly have each filed a motion for summary disposition. Respondents Steven Sands and Martin Sands (collectively, the Sands Brothers) move for an extension of time to file their opposition, to permit newly retained counsel sufficient time to review the filings in this case and file an opposition. The Division opposes the motion on the basis that an extension of time would put the Division and the Sands Brothers on two separate briefing tracks.

The motion is GRANTED. The due date for all parties' oppositions is extended from February 6 to February 13, 2015. The due date for replies from the Division and Kelly is extended from February 17 to February 24, 2015.

SO ORDERED.

Cameron Elliot Administrative Law Judge