

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

ADMINISTRATIVE PROCEEDINGS RULINGS  
Release No. 3322 / November 16, 2015

ADMINISTRATIVE PROCEEDING  
File No. 3-16155

In the Matter of

NICHOLAS ROWE

ORDER ON DOCUMENT SUBPOENAS

On November 13, 2015, Nicholas Rowe requested the issuance of document subpoenas to twelve individuals. In part, those subpoenas request documents relating to non-disclosure agreements, settlements, and communications with attorneys.

To the extent, if any, that a recipient of one of these subpoenas determines that a requested document should be excused from production based on privilege, the purportedly privileged document should not be produced at present. If only a portion of the document is privileged, a copy with the privileged information redacted should be produced. In lieu of the production of a document, or portion thereof, for each document, the individual asserting the privilege should identify the particular privilege(s) asserted, the author of the document, all recipients, a general description of the nature of the document (e.g., email, report) and the subject it relates to, and the date of the document.

Rowe shall include a copy of this Order with each subpoena he serves on the twelve individuals.

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Jason S. Patil  
Administrative Law Judge