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

Administrative Proceedings Rulings Release No. 5425 / December 27, 2017

Administrative Proceeding File No. 3-17104

In the Matter of

BioElectronics Corp., IBEX, LLC, St. John's, LLC, Andrew J. Whelan, Kelly A. Whelan, CPA, and Robert P. Bedwell, CPA

Order Granting Motion for Extension of Time and Pages in Part

Respondents filed a motion requesting an additional thirty days and up to fifty pages for their brief on remand. But the purpose of this brief is limited to explaining any new evidence and addressing any changes in the relevant law. The parties are not to relitigate the entire proceeding. Because of this limited scope, an extension of thirty days is not warranted. Due to holidays during the briefing period, I will grant an additional week. The briefs are now due January 12, 2018, with any response due January 19, 2018.

Similarly, absent some extraordinary justification not apparent from Respondents' motion, a fifty-page brief is not necessary. The briefs and any responses shall be limited to 3,000 words. To the extent either party has raised a relevant issue in its extensive briefing to the Commission on appeal, that party may incorporate by reference the appropriate section or sections of its appellate brief.

Cameron Elliot Administrative Law Judge