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

Administrative Proceedings Rulings Release No. 6107 / September 27, 2018

Administrative Proceeding File No. 3-18202

In the Matter of

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

Order Following Reassignment

The Securities and Exchange Commission initiated this proceeding with an order instituting proceedings (OIP) on September 22, 2017. An administrative law judge issued an initial decision of default as to all Respondents on October 25, 2017. *Penny Auction Sols., Inc.*, Initial Decision Release No. 1204, 2017 SEC LEXIS 3403.

The proceeding was assigned to me on September 12, 2018, after being remanded by the Commission. *Pending Admin. Proc.*, Admin. Proc. Rulings Release No. 5955, 2018 SEC LEXIS 2264 (ALJ); *Pending Admin. Proc.*, Securities Act of 1933 Release No. 10536, 2018 SEC LEXIS 2058 (Aug. 22, 2018). I direct the parties to submit proposals for the conduct of further proceedings by October 17, 2018, and to address the items referenced in 17 C.F.R. § 201.221(c). If the Division of Enforcement is unable to contact Respondents, it should submit a notice to that effect by October 17. If Respondents fail to participate by not submitting a proposal, and I find that they have been served with the OIP but never filed an answer, they may be subject to an initial decision of default against them. *See Pending Admin. Proc.*, 2018 SEC LEXIS 2058, at *4; 17 C.F.R. §§ 201.155(a)(2), .220(f).

Brenda P. Murray Chief Administrative Law Judge