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UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING File No. 3-13927



In the Matter of

GORDON BRENT PIERCE, NEWPORT CAPITAL CORP., and JENIROB COMPANY LTD.,

Respondents.

DIVISION OF ENFORCEMENT'S MOTION FOR ORAL ARGUMENT ON THE PARTIES' CROSS-PETITIONS FOR REVIEW OF INITIAL DECISION AS TO GORDON BRENT PIERCE

MARC J. FAGEL MICHAEL S. DICKE JOHN S. YUN JUDITH L. ANDERSON STEVEN D. BUCHHOLZ 44 Montgomery Street, Suite 2600 San Francisco, CA 94104 Tel: (415) 705-2500 Fax: (415) 705-2501 Attorneys for DIVISION OF ENFORCEMENT Pursuant to Rule 451 the Commission's Rules of Practice, the Division of Enforcement requests that the Commission grant oral argument with respect to whether to affirm all or part of the Initial Decision as to Gordon Brent Pierce, issued on July 27, 2011 in this proceeding. Good cause exists for allowing oral argument. The Commission's decisional process would be aided because the parties' cross-petitions for review raise significant procedural and policy issues regarding enforcement of Section 5 of the Securities Act of 1933 and regarding the equitable and legal affirmative defenses, particularly res judicata, that may be raised by respondents in administrative proceedings alleging such violations.

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Dated: October 11, 2011

Respectfully submitted,

Marc J. Fagel Michael S. Dicke John S. Yun Judith L. Anderson Steven D. Buchholz Attorneys for DIVISION OF ENFORCEMENT