

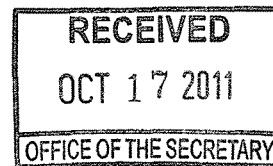
**UNITED STATES OF AMERICA**  
before the  
**SECURITIES AND EXCHANGE COMMISSION**

**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 RESPONSE TO RESPONDENT'S MOTION FOR  
ORAL ARGUMENT ON THE PARTIES' CROSS-PETITIONS FOR REVIEW OF  
INITIAL DECISION AS TO GORDON BRENT PIERCE AND FOR REPLY BRIEFS**

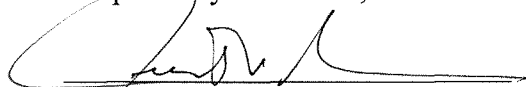
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In response to the Motion for Oral Argument and Additional Time filed by Respondent Gordon Brent Pierce on October 11, 2011, the Division of Enforcement agrees that oral argument on the parties' cross-appeals could assist the Commission's deliberations. The facts and legal issues before the Commission do not appear sufficiently complex, however, as to require additional time for oral argument beyond the one-half hour per side provided by Rule 451(c) of the Commission's Rules of Practice.

While the Division does not believe reply briefs are necessary in view of the considerable briefing already in the record before the Commission on the cross-appeals, should the Commission order reply briefs to be filed, the briefs would be due under Rule of Practice 450(a) on November 24, 2011, which is Thanksgiving Day. Therefore, the Division would request that the briefs be due one day earlier, on November 23, 2011.

Dated: October 13, 2011

Respectfully submitted,



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