## UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

## ADMINISTRATIVE PROCEEDING File Nos. 3-14872, 3-15116

In the Matter of

BDO China Dahua CPA Co., Ltd.; Ernst & Young Hua Ming LLP; KPMG Huazhen (Special General Partnership); Deloitte Touche Tohmatsu CPA Ltd.; PricewaterhouseCoopers Zhong Tian CPAs Limited



Respondents.

## CONSENT MOTION REGARDING NUMBER AND PAGE LIMITATIONS OF REPLY BRIEFS

Respondents BDO China Dahua CPA Co., Ltd.; Ernst & Young Hua Ming LLP; KPMG Huazhen (Special General Partnership); Deloitte Touche Tohmatsu Certified Public Accountants Ltd. ("DTTC"); and PricewaterhouseCoopers Zhong Tian CPAs Limited ("PwC Shanghai") (collectively, "Respondents"), by and through the undersigned counsel, jointly move the Court for an order approving the below-described modification to the briefing instructions the Court established at the status conference held on January 9, 2013. The Division of Enforcement ("Division") consents to this motion.

At the status conference, the Court allowed each of the five Respondents to submit reply briefs in support of the Respondents' Motions for Summary Disposition no later than March 8, 2013, and further ordered that no Respondent's reply brief should exceed 10 pages. In the interests of efficiency and judicial economy, Respondents jointly propose that only two Respondents file reply briefs, to be joined by the other Respondents. To account for this reduction in the total number of reply briefs, the Respondents jointly propose that the page limits of the two reply briefs that are filed be moderately increased. Specifically, Respondents respectfully request an order approving the following arrangement:

1. Respondents DTTC and PwC Shanghai shall each file a reply brief in support of the Respondents' Motions For Summary Disposition. Respondents BDO China, E&Y Hua Ming, KPMG Huazhen, shall not file separate reply briefs, but shall join the reply briefs filed by DTTC and PwC Shanghai.

2. The reply briefs of DTTC and PwC Shanghai each shall not exceed 14 pages in length.

3. The Division consents to this motion.

Respectfully submitted,

Deborah R. Meshulam deborah.meshulam@dlapiper.com DLA Piper LLP 500 Eighth Street, N.W. Washington, D.C. 20004 (202) 799-4511 COUNSEL FOR BDO CHINA DAHUA CPA CO., LTD. Dated: March \_, 2013

lendel

David Mendel U.S. Securities & Exchange Commission 100 F Street, N.E. Washington, DC 20549-5985 202-551-4418 Email: mendeld@sec.gov

COUNSEL FOR DIVISION OF ENFORCEMENT Dated: March 7, 2013 reduction in the total number of reply briefs, the Respondents jointly propose that the page limits of the two reply briefs that are filed be moderately increased. Specifically, Respondents respectfully request an order approving the following arrangement:

1. Respondents DTTC and PwC Shanghai shall each file a reply brief in support of the Respondents' Motions For Summary Disposition. Respondents BDO China, E&Y Hua Ming, KPMG Huazhen, shall not file separate reply briefs, but shall join the reply briefs filed by DTTC and PwC Shanghai.

2. The reply briefs of DTTC and PwC Shanghai each shall not exceed 14 pages in length.

3. The Division consents to this motion.

Respectfully submitted,

. Meshelan

Deborah R. Meshulam deborah.meshulam@dlapiper.com DLA Piper LLP 500 Eighth Street, N.W. Washington, D.C. 20004 (202) 799-4511 COUNSEL FOR BDO CHINA DAHUA CPA CO., LTD. Dated: March <u>7</u>, 2013 David Mendel U.S. Securities & Exchange Commission 100 F Street, N.E. Washington, DC 20549-5985 202-551-4418 Email: mendeld@sec.gov

COUNSEL FOR DIVISION OF ENFORCEMENT Dated: March \_\_, 2013

Mit

Richard A. Martin rmartin@orrick.com Robert G. Cohen. rgcohen@orrick.com Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, NY 10019 212-506-5000 COUNSEL FOR THE RESPONDENT ERNST & YOUNG HUA MING LLP Dated: March <u>7</u>, 2013

Neal E. Sullivan neal.sullivan@bingham.com Timothy B. Nagy timothy.nagy@bingham.com Bingham McCutchen LLP 2020 K Street, NW Washington, DC 20006 202-373-6000 COUNSEL FOR RESPONDENT KPMG HUAZHEN (SPECIAL GENERAL PARTNERSHIP) Dated: March \_\_, 2013

Miles N. Ruthberg miles.ruthberg@lw.com Jamie L. Wine jamie.wine@lw.com Latham & Watkins LLP 885 Third Avenue New York, NY 10022 (202)-906-1200 COUNSEL FOR RESPONDENT DELOITTE TOUCHE TOHMATSU CERTIFIED PUBLIC ACCOUNTANTS LTD. Dated: March \_, 2013 Richard A. Martin rmartin@orrick.com Robert G. Cohen. rgcohen@orrick.com Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, NY 10019 212-506-5000 COUNSEL FOR THE RESPONDENT ERNST & YOUNG HUA MING LLP Dated: March \_, 2013

Neal E. Sullivan neal.sullivan@bingham.com Timothy B. Nagy timothy.nagy@bingham.com Bingham McCutchen LLP 2020 K Street, NW Washington, DC 20006 202-373-6000 COUNSEL FOR RESPONDENT KPMG HUAZHEN (SPECIAL GENERAL PARTNERSHIP) Dated: March , 2013

Miles N. Ruthberg miles.ruthberg@lw.com Jamie L. Wine jamie.wine@lw.com Latham & Watkins LLP 885 Third Avenue New York, NY 10022 (202)-906-1200 COUNSEL FOR RESPONDENT DELOITTE TOUCHE TOHMATSU CERTIFIED PUBLIC ACCOUNTANTS LTD. Dated: March 7, 2013

Michael D. Warden mwarden@sidley.com Gary Bendinger gbendinger@sidley.com Sidley Austin LLP 1501 K Street, N.W. Washington, D.C. 20005 (202)736-8000 COUNSEL FOR RESPONDENT DELOITTE TOUCHE TOHMATSU CERTIFIED PUBLIC ACCOUNTANTS LTD. Dated: March 7, 2013

Winhald S. J.h.

Michael S. Flynn michael.flynn@davispolk.com Davis Polk & Wardwell, LLP 450 Lexington Avenue New York, NY 10017 (212) 450-4000 COUNSEL FOR RESPONDENT PRICEWATERHOUSECOOPERS ZHONG TIAN CPAS LIMITED Dated: March **7**, 2013