

**HARD COPY**

**UNITED STATES OF AMERICA  
BEFORE THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION**

In the Matter of the Application of

SCOTTSDALE CAPITAL ADVISORS  
CORPORATION, JOHN J. HURRY, TIMOTHY B.  
DIBLASI, AND D. MICHAEL CRUZ

For Review of Disciplinary Action Taken by FINRA



3-18612

**PETITIONERS' MOTION FOR ORAL ARGUMENT AND INCORPORATED  
MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT**

Pursuant to Rule 451 of the Commission's Rules of Practice, Petitioners Scottsdale Capital Advisors, John J. Hurry, Timothy B. DiBlasi, and D. Michael Cruz, respectfully move for oral argument before the Commission in the above-captioned matter. Rule 451 provides that oral argument is appropriate where "the presentation of facts and legal arguments in the briefs and record and the decisional process would be significantly aided by oral argument." 17 C.F.R. § 201.451(a).

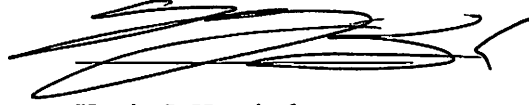
This is a complex, multi-party case that involved a hearing in excess of two weeks and hundreds of exhibits involving a series of complicated microcap securities transactions. The complexity is corroborated by the fact that FINRA's National Adjudicatory Council's decision that is under review here is 104 pages.

Since opening briefs are limited to only 14,000 words, the Commission will greatly benefit from having the opportunity to ask the parties specific questions about any areas of confusion. Oral arguments will ensure that the facts are fully understood and that any lingering concerns are adequately addressed.

Because the decisional process would be significantly aided by oral argument, the Commission should grant the Motion for Oral Argument.

Dated: October 5, 2018

Respectfully Submitted,

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that are difficult to decipher.


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**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2018, I caused the foregoing to be served by facsimile on the following:

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