UNITED STATES OF AMERICA

Before the

SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

ADMINISTRATIVE PROCEEDING File No. 3-20387

In the Matter of the Application of

TITAN SECURITIES AND BRAD C. BROOKS

For Review of Disciplinary Action Taken by

FINRA

MOTION OF APPLICANTS TITAN SECURITIES AND BRAD C. BROOKS REQUESTING ORAL ARGUMENT ON APPLICATION FOR REVIEW

Applicants Titan Securities ("Titan") and Brad C. Brooks ("Brooks") respectfully submit this Motion Requesting Oral Argument on Application for Review pursuant to Rule of Practice 451(b).

Titan and Brooks are filing today, along with this Motion Requesting Oral Argument, their Opening Brief in Support of Application for Review in this proceeding, which seeks review of a decision of the National Adjudicatory Council ("NAC") of FINRA dated June 2, 2021.

As further stated and reflected in Applicants' Opening Brief, the underlying case and decision on review are complex, involving three separate sets of facts and claims (relating to outside business activity issues, email recordkeeping issues, and minimum contingency offering issues), and also involving numerous federal securities statutes and rules as well as NASD and FINRA rules. The underlying case has a lengthy procedural history, and the conduct at issues stretches back to the period from 2010 to 2013. The record on review consists of nine volumes and over 6,500 pages of documents.

For all of these reasons, and as further reflected in the Opening Brief, Applicants believe that the presentation of facts and legal arguments in the briefs and record and the decisional process would be significantly aided by oral argument.

Accordingly, Applicants respectfully request that oral argument be granted and set for this proceeding.

Dated: December 1, 2021

Respectfully Submitted,

By: <u>/s/ Bruce B. Kelson</u> Bruce B. Kelson

Bruce B. Kelson, Esq. SCHNADER HARRISON SEGAL & LEWIS LLP 650 California Street, 19th Floor San Francisco, CA 94108 (415) 364-6700

Attorneys for Applicants Titan Securities and Brad C. Brooks

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CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of December, 2021, I caused a copy of the foregoing

Motion of Applicants Titan Securities and Brad C. Brooks Requesting Oral Argument on Application

for Review to be sent via Electronic Mail to the following address:

Ersilia Passaro, Esq. Office of General Counsel FINRA 1735 K Street, N.W. Washington, D.C. 20006 Ersilia.Passaro@finra.org

Executed on December 1, 2021, at Concord, California.

Tiana Reyes Tiana Reyes, Legal Secretary By:

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