

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

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22165**

**In the Matter of**

**Invesco Distributors, Inc. and  
Invesco Advisers, Inc.**

**Respondents.**

**Respondents Invesco Distributors, Inc.  
and Invesco Advisers, Inc.’s Consented  
to Motion for Extension to File Reply  
in Support of Motion to Amend and  
Motion to Stay Implementation of  
Order Instituting Proceedings**

Respondents Invesco Advisers, Inc. (“IAI”) and Invesco Distributors, Inc. (“IDI,” and with IAI “Respondents” or “Invesco”), by and through their undersigned counsel, Ropes & Gray LLP, respectfully request a modest extension of the deadline—from February 14, 2025 to February 19, 2025—to file Invesco’s reply brief in support of its Motion to Amend and Motion to Stay the U.S. Securities and Exchange Commission’s (the “SEC” or the “Commission”) September 24, 2024 Order Instituting Administrative Cease-and-Desist Proceedings Pursuant to Sections 15(b) and 21C of the Securities Exchange Act of 1934 and Sections 203(e) and 203(k) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order (the “Order”). The Order was part of the SEC’s multi-year electronic communications sweep (the “Electronic Communications Sweep”). Invesco brings this motion pursuant to Rule 161(a) of the Commission’s Rules of Practice, 17 C.F.R. § 201.161(a). The Division of Enforcement (the “Division”) has consented to the extension request contained herein.

On February 5, 2025, Invesco filed a Motion to Amend the Order (the “Motion to Amend”), and a separate Motion to Stay the Order (the “Motion to Stay,” and together with the Motion to Amend, the “Motions”) pending the Commission’s decision on the Motion to Amend. On February 11, 2025, at 5:10 pm EST, Invesco received via electronic mail the Division’s brief opposing both Motions (the “Opposition”). Later that night, at 9:36 pm EST, Invesco requested that the Division consent to the modest extension sought here. On February 12, 2025, the Division informed Invesco that it consented to Invesco’s request for an extension.

While Rule 154(b) of the Commission’s Rules of Practice requires Invesco to file any reply brief by February 14, 2025, the Commission has previously granted similar requests for extensions of time to file briefs, stating that “pending further order of the Commission, all reasonable requests for extensions of time will not be disfavored as stated in Rule 161.” *In the Matter of Arch Leasing Corp Trust*, Exchange Act Release No. 102383, at 1 n.3 (Feb. 10, 2025) (granting a one-week extension to file a response brief (citing *Pending Administrative Proceedings*, Exchange Act Release No. 88415, 2020 WL 1322001, at \*1 (Mar. 18, 2020))). The Commission has also specifically granted extension requests in the context of ongoing proceedings related to the Electronic Communications Sweep. *See, e.g., In the Matter of Piper Sandler & Co.*, Exchange Act Release No. 102349 (Feb. 5, 2025) (granting a one-week extension to file a response brief).

Accordingly, Invesco respectfully requests that the Commission grant this motion for an extension and enter an Order extending Invesco’s time to file its reply brief in support of its Motion to Amend and Motion to Stay the Order until February 19, 2025.

Dated: February 12, 2025

Respectfully submitted,

/s/ R. Daniel O'Connor

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## CERTIFICATE OF SERVICE

In accordance with Rules of Practice 150 and 151, 17 C.F.R. §§ 201.150 & 201.151, I certify that I filed this document using the eFAP system; I further certify that, on **February 12, 2025**, a copy of **Respondents Invesco Distributors, Inc. and Invesco Advisers, Inc.’s Consented to Motion for Extension to File Reply in Support of Motion to Amend and Motion to Stay Implementation of Order Instituting Proceedings** was served via electronic mail on the following:

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