UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 103820 / September 2, 2025

Admin. Proc. File No. 3-22477

In the Matter of the Application of

MICHAEL SCOTT BARROWS

For Review of Action Taken by

FINRA

ORDER GRANTING EXTENSION OF TIME

On June 3, 2025, Michael Scott Barrows filed an application for review of action taken by FINRA. After FINRA filed the certified record, the Commission issued an order scheduling briefs. On July 28, 2025, the Commission granted an unopposed motion to extend all the dates in the briefing schedule by 30 days. ²

On August 27, 2025, Barrows filed an additional unopposed motion to extend all the dates in the briefing schedule. Barrows states that he is seeking the extension to accommodate a scheduling conflict in another matter and allow adequate time to fully brief the complex legal and factual issues involved. It appears appropriate to grant Barrows's unopposed motion.³

¹ Michael Scott Barrows, Exchange Act Release No. 103329, 2025 WL 1783586 (June 26, 2025).

² *Michael Scott Barrows*, Exchange Act Release No. 103556, 2025 WL 2144130 (July 28, 2025).

See Rule of Practice 161(a), 17 C.F.R. § 201.161(a) (permitting extensions of deadlines for "good cause shown"); see also Pending Administrative Proceedings, Exchange Act Release No. 88415, 2020 WL 1322001 (Mar. 18, 2020) (stating that "pending further order of the Commission, all reasonable requests for extensions of time will not be disfavored as stated in Rule 161" (citing 17 C.F.R. § 201.161(b)(1))).

Therefore, it is ORDERED that Barrows shall file a brief in support of his application for review by September 11, 2025; FINRA shall file its opposition brief by October 14, 2025; and Barrows shall file any reply brief by October 28, 2025.

For the Commission, by its Secretary, pursuant to delegated authority.

Vanessa A. Countryman Secretary