UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 103944 / September 11, 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. Subsequently, the Commission granted another unopposed request to extend the briefing schedule by 14 days.

On September 10, 2025, Barrows, through his attorney, filed an additional unopposed motion to extend all the dates in the briefing schedule. Barrows's attorney states that he is seeking the extension to accommodate a scheduling conflict due to a pressing hearing in another matter. It appears appropriate to grant Barrows's unopposed motion.⁴

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).

³ *Michael Scott Barrows*, Exchange Act Release No. 103820, 2025 WL 2522677 (Sept. 2, 2025).

⁴ 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

Therefore, it is ORDERED that Barrows shall file a brief in support of his application for review by September 25, 2025; FINRA shall file its opposition brief by October 27, 2025; and Barrows shall file any reply brief by November 10, 2025.

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

Vanessa A. Countryman Secretary

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))).