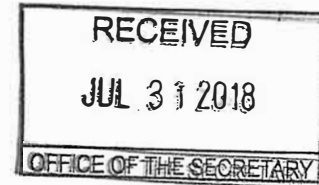




Financial Industry Regulatory Authority

Jante Turner  
Associate General Counsel

Telephone: 202-728-8317  
Facsimile: 202-728-8264



July 31, 2018

**VIA MESSENGER**

Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F Street, NE, Room 10915  
Washington, DC 20549-1090

**HARD COPY**

**RE: SCOTTSDALE CAPITAL ADVISORS CORPORATION, JOHN J. HURRY, TIMOTHY B. DIBLASI, AND D. MICHAEL CRUZ  
ADMINISTRATIVE PROCEEDING FILE NO. 3-18612**

Mr. Fields:

On July 30, 2018, counsel for John Hurry filed a reply brief in support of Hurry's motion to stay sanctions. FINRA is requesting that the Commission strike Hurry's reply brief.

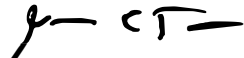
The rule governing the expedited consideration of the stay of an action by a self-regulatory organization, Commission Rule of Practice 401(d)(3), does not authorize the filing of a reply brief. Commission Rule of Practice 401(d)(3) contemplates the submission of the stay motion and the opposing party's response to the stay motion. That is all. The rule states, "[w]here the action complained of has already taken effect and the motion for stay is filed within 10 days of the effectiveness of the action, . . . the consideration of and decision on the motion for a stay shall be expedited . . . ." The rule adds, "[w]here consideration will be expedited, persons opposing the motion for a stay may file a statement in opposition within two days of service of the motion . . . ." Commission Rule of Practice 401(d)(3) does not authorize a moving party's submission of a reply brief.

Furthermore, in the event that Hurry files with the Commission for leave to file a reply brief, FINRA opposes the motion. Allowing Hurry to file a reply brief is inconsistent with Commission Rule of Practice 401(d)(3), which states that, when a motion for a stay is given expedited consideration, "the motion for a stay shall be expedited in every way . . . ." The submission of reply briefs within this expeditious and efficient framework runs afoul of Commission Rule of Practice 401(d)(3).

Brent J. Fields, Secretary  
July 31, 2018  
Page - 2 -

For these reasons, FINRA requests that the Commission strike Hurry's reply brief and deny Hurry's motion for leave to file a reply brief if he chooses to file one.

Very truly yours,



Jante Turner

cc: Kevin Harnisch, Esq.  
Michael Edney, Esq.  
Vijay Rao, Esq.  
Norton Rose Fulbright US LLP  
799 9th Street NW, Suite 1000  
Washington, DC 20001-4501  
kevin.harnisch@nortonrosefulbright.com  
michael.edney@nortonrosefulbright.com  
vijay.rao@nortonrosefulbright.com

Ryan Meltzer, Esq.  
Norton Rose Fulbright US LLP  
98 San Jacinto Boulevard, Suite 1100  
Austin, TX 78701-4255  
ryan.meltzer@nortonrosefulbright.com