GORDON STEVEN MITCHELL Form 3 January 21, 2003

FORM 3

U.S. SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(f) of the Investment Company Act of 1940

| 1. Name and Address of Reporting Person* | | | 2. Date 4. Issuer Name and Ticker or Trading Symbol |
|--|--|----------|---|
| GORDON | STEVEN | MITCHELL | of Event Requiring PIVOTAL CORPORATION Statement for - PVTL (Month/Day/Year) |
| (Last) | (First) | (Middle) | |
| | ast) (First) (Middle) 05 W. Ravenswood Lane (Street) lensburg, W.A. 98926 | | 5. Relationship of Reporting 3. IRSPersons to Issuer or Socia (Check all applicable) Security NumlefX]Director of [] 10% Owner Reporting Person (Volund#@per (give title below) [] Other (specify below) - - - - - - - - - - - - - |

| | []Form filed by More than One Reporting Person | | | | | |
|--|---|--|--|--|--|--|
| (City ,State, Zip) * If the Form is filed by more than one Reporting Person, <i>see</i> Instructions 5(b)(v). | Table I - Non-Derivative Services Beneficially Owned | | | | | |
| 1. Title of Security (Instr. 4) | 3. Ownership 2 Form: Amount Direct (D) or of Indirect (I) Securitie(Instr. 5) Beneficially Owner (Inst. 4) | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly. (Over)

(Print or Type Response)

FORM 3 (continued) Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

| 1. T of Deri Secu (Inst 4) | tative Exerci Tative Expira | te isable and ation Date h Day Year) | 3. Title and Amount of Securities Underlying Derivative Security (Instr. 4) | | or Exerc Price of Deriv | ative | 5. Owners Form of Derivat Security Direct | ve | 6. Nature of Indirect Beneficia Ownershi (Instr. |
|---|--------------------------------|---|---|----------------------------------|-------------------------------------|-------|--|----|--|
| | Date Exercisat | Expiration Date le | Title | Amount or Number of Shares | Secur | nty | (D) orIndirect(1)(Instr.5) | | 5) |
| stock options | | | | 55,000 | | D | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Explanatior | n of Responses: | | | | | | | | |

/s/ Steven Mitchell Gordon December 18, 2002

| ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. | | | |
|---|------------------------------------|--------|-------------------|
| See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a). | **Signature of Reporting Person | | Date |
| Note: File three copies of this Form, one of whit insufficient, <i>See</i> Instruction 6 for procedure. | hich must be manually sign | ed. If | space provided is |