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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

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In the Matter of,	:	
	:	
LYNN TILTON	:	
PATRIARCH PARTNERS, LLC,	:	Administrative Proceeding
PATRIARCH PARTNERS VIII, LLC,	:	File No. 3-16462
PATRIARCH PARTNERS XIV, LLC and	:	
PATRIARCH PARTNERS XV, LLC	:	Judge Carol Fox Foelak
	:	
Respondents.	:	
	:	
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RESPONDENTS' MOTION *IN LIMINE* TO PRECLUDE EVIDENCE CONCERNING RECKLESSNESS AND NEGLIGENCE AND TO REQUIRE THE DIVISION TO PROVE INTENTIONAL MISCONDUCT

Pursuant to Rules 300 and 320 of the U.S. Securities and Exchange Commission (the "Commission") Rules of Practice (the "Rules"), 17 C.F.R. §§ 201.300, 201.320, upon the accompanying Memorandum of Law, dated August 26, 2016, and the record of proceedings herein, Respondents Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners VIII, LLC, Patriarch Partners XIV, LLC, and Patriarch Partners XV, LLC (collectively, "Patriarch" or "Respondents"), respectfully move for an order precluding the Division of Enforcement (the "Division") from introducing evidence concerning recklessness and negligence and requiring the Division to prove intentional misconduct.

Dated: New York, New York
August 26, 2016

GIBSON, DUNN & CRUTCHER LLP

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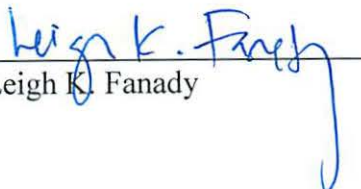
CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of Respondents' Motion *In Limine* to Preclude Evidence Concerning Recklessness and Negligence and to Require the Division to Prove Intentional Misconduct and a memorandum of law in support thereof on this 26th day of August, 2016, in the manner indicated below:

United States Securities and Exchange Commission
Office of the Secretary
Attn: Secretary of the Commission Brent J. Fields
100 F Street, N.E.
Mail Stop 1090
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Fax: (202) 772-9324
(By Facsimile and original and three copies by Federal Express)

Hon. Judge Carol Fox Foelak
100 F Street, N.E.
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Washington, D.C. 20549
(By Federal Express)

Dugan Bliss, Esq.
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Securities and Exchange Commission
Denver Regional Office
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(By Email pursuant to parties' agreement)



Leigh K. Fanady