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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.	:	
-----	x	

**RESPONDENTS' MOTION TO COMPEL
THE PRODUCTION OF BRADY MATERIALS**

Pursuant to Rule 230 of the U.S. Securities and Exchange Commission Rules of Practice, 17 C.F.R. § 201.230 ("Rule 230"), *Brady v. Maryland*, 373 U.S. 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972), upon the accompanying Memorandum of Law and Declaration of Mary Kay Dunning, both dated August 31, 2016, and the recording of proceedings herein, Respondents Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners VIII, LLC, Patriarch Partner XIV, LLC, and Patriarch Partners XV, LLC (collectively, "Respondents") respectfully move for an order compelling the production of documents under Rule 230(b)(2), *Brady*, 373 U.S. at 87, and *Giglio*, 405 U.S. at 154-55.

Dated: New York, New York
August 31, 2016

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