

HARD COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



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In the Matter of, :
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LYNN TILTON : Administrative Proceeding
PATRIARCH PARTNERS, LLC, : File No. 3-16462
PATRIARCH PARTNERS VIII, LLC, :
PATRIARCH PARTNERS XIV, LLC and :
PATRIARCH PARTNERS XV, LLC : Judge Carol Fox Foelak
 :
Respondents. :
 :
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**RESPONDENTS' MOTION *IN LIMINE* TO PRECLUDE THE
DIVISION OF ENFORCEMENT FROM SEEKING DISGORGEMENT**

Pursuant to Rule 300 of the U.S. Securities and Exchange Commission (the "Commission" or "SEC") Rules of Practice (the "Rules"), 17 C.F.R. §§ 201.300, and pursuant to 15 U.S.C. § 78u-2, and upon the accompanying Memorandum of Law, dated August 31, 2016, the accompanying Declaration of Akiva Shapiro, dated August 31, 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 SEC Division of Enforcement from seeking disgorgement as a remedy in this proceeding.

Dated: New York, New York
August 31, 2016

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