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OFFICE OF THE SECRETARY

UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

In the Matter of, LYNN TILTON PATRIARCH PARTNERS, LLC, PATRIARCH PARTNERS VIII, LLC, PATRIARCH PARTNERS XIV, LLC and PATRIARCH PARTNERS XV, LLC Respondents.

RESPONDENTS' MOTION IN LIMINE TO EXCLUDE TRANSCRIPTS OF INVESTIGATIVE TESTIMONY, INCLUDING DIVISION EXHIBITS 194 THROUGH 206

Pursuant to Rules 235, 300 and 320 of the U.S. Securities and Exchange Commission

(the "Commission" or "SEC") Rules of Practice (the "Rules"), 17 C.F.R. §§ 201.235, .300, .320,

and pursuant to 5 U.S.C. § 556(d), and upon the accompanying Memorandum of Law, dated

September 1, 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

excluding all transcripts of investigative testimony, and specifically excluding SEC Division of

Enforcement's Exhibits 194 through 206.

Dated: New York, New York September 1, 2016

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GIBSON, DUNN & CRUTCHER LLP

Randy M. Mastro /ma By:

Randy M. Mastro Reed Brodsky Barry Goldsmith Caitlin J. Halligan Mark A. Kirsch Monica Loseman Lawrence J. Zweifach Lisa H. Rubin

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Counsel for Respondents

CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of Respondents' Motion *In Limine* to Exclude Transcripts of Investigative Testimony, Including Division Exhibits 194 Through 206, and a memorandum of law in support thereof on this 1st day of September, 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 Washington, D.C. 20549 Fax: (202) 772-9324 (By Facsimile and original and three copies by Federal Express)

Hon. Judge Carol Fox Foelak 100 F Street, N.E. Mail Stop 2557 Washington, D.C. 20549 (By Federal Express)

Dugan Bliss, Esq. Division of Enforcement Securities and Exchange Commission Denver Regional Office 1961 Stout Street, Ste. 1700 Denver, CO 80294 (By Email pursuant to parties' agreement)

Leigh K. Fanady