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## 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.

Administrative Proceeding File No. 3-16462

Judge Carol Fox Foelak

## RESPONDENTS' MOTION TO COMPEL THE PRODUCTION OF BRADY MATERIAL AND JENCKS ACT WITNESS STATEMENTS

Pursuant to Rule 326 of the U.S. Securities and Exchange Commission ("Commission")

Rules of Practice (the "Rules"), 17 C.F.R. §§ 201.326, and basic notions of procedural due process, upon the accompanying Memorandum of Law and the accompanying Declaration of Monica Loseman, both dated October 12, 2016, and the record of the proceedings herein, Respondents Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners VIII, LLC, Patriarch Partners XIV, LLC, and Patriarch Partners XV, LLC (collectively, "Respondents") respectfully move for an order compelling the Division to re-certify it has complied with its Brady obligations and to produce any Jencks Act witness statements to Respondents by October 18, 2016. Respondents also respectfully request expedited briefing concerning the issues addressed herein, and oral argument, in light of the fact that the hearing is to commence in less than two weeks. Specifically, Respondents request that the Division's brief in opposition be due Monday, October 17, and that Respondents' reply be due Wednesday, October 19.

Dated: New York, New York October 12, 2016

GIBSON, DUNN & CRUTCHER LLP

By: Kanay III.

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