

HARD COPY

RECEIVED
OCT 18 2016
OFFICE OF THE SECRETARY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

-----	X	
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 STAY THE PROCEEDINGS AND COMPEL THE DIVISION TO MAKE FURTHER DISCLOSURES REGARDING TWO DIVISION WITNESSES, AND FOR EXPEDITED BRIEFING AND AN EVIDENTIARY HEARING

Pursuant to Rule 111 of the U.S. Securities and Exchange Commission's Rules of Practice, 17 C.F.R. § 201.111, upon the accompanying Memorandum of Law, the accompanying Declaration of Susan E. Brune, dated October 16, 2016, and all exhibits thereto, 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, respectfully move for an order staying the proceedings and compelling the Division of Enforcement to make further disclosures regarding two non-party Division witnesses, and for expedited briefing and an evidentiary hearing.

Dated: New York, New York
October 16, 2016

BRUNE LAW P.C.

By: /s Susan Brune
Susan E. Brune
BRUNE LAW P.C.
450 Park Avenue
New York, NY 10022

Counsel for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, I caused to be served true and correct copies of the following documents in the manner indicated below:

1. Respondents' Motion to Stay the Proceedings and Compel the Division to Make Further Disclosures Regarding Two Division Witnesses, and for Expedited Briefing and an Evidentiary Hearing,
2. Respondents' Memorandum of Law in Support of Respondents' Motion to Stay the Proceedings and Compel the Division to Make Further Disclosures Regarding Two Division Witnesses, and for Expedited Briefing and an Evidentiary Hearing,
3. Declaration of Susan E. Brune in Support of Respondents' Motion to Stay the Proceedings and Compel the Division to Make Further Disclosures Regarding Two Division Witnesses, and for Expedited Briefing and an Evidentiary Hearing (**FILED UNDER SEAL**), and
4. Motion for Confidential Treatment of the Declaration of Susan E. Brune in Support of Respondents' Motion to Stay the Proceedings and Compel the Division to Make Further Disclosures Regarding Two Division Witnesses, and for Expedited Briefing and an Evidentiary Hearing.

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 without under-seal materials, and three copies and an original, with confidential material in sealed envelopes, by Federal Express)

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

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)



Christopher Hazlehurst