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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, 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 BARCLAYS TO PRODUCE A DOCUMENT RESPONSIVE TO A COURT-ORDERED SUBPOENA AND FOR EXPEDITED BRIEFING

Pursuant to Rule 111 of the U.S. Securities and Exchange Commission Rules of Practice,

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and upon the Memorandum of Law and the Declaration of Susan E. Brune, both dated October

17, 2016, Respondents Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners VIII, LLC,

Patriarch Partner XIV, LLC, and Patriarch Partners XV, LLC respectfully move for an order

compelling Barclays to produce a document responsive to a court-ordered subpoena.

Respondents also respectfully request expedited briefing, with any responsive brief to be filed by

October 19, 2016.

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Dated: New York, New York October 17, 2016

BRUNE LAW P.C.

2 be By:

Susan E. Brune Christopher A. Hazlehurst

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