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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

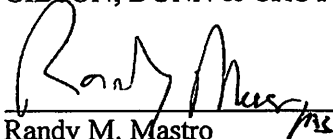
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In the Matter of, :
 :
LYNN TILTON : Administrative Proceeding
PATRIARCH PARTNERS, LLC, : File No. 3-16462
PATRIARCH PARTNERS VIII, LLC, :
PATRIARCH PARTNERS XIV, LLC and : Judge Carol Fox Foelak
PATRIARCH PARTNERS XV, LLC :
 :
Respondents. :
----- X

**RESPONDENTS' MOTION *IN LIMINE* TO STRIKE IN THEIR ENTIRETY THE
REPORTS OF DIVISION OF ENFORCEMENT EXPERT MICHAEL G. MAYER AND
TO PRECLUDE HIS TESTIMONY**

Pursuant to Rules 300 and 320 of the U.S. Securities and Exchange Commission (the "Commission") Rules of Practice (the "Rules"), 17 C.F.R. §§ 201.300, .320, upon the accompanying Memorandum of Law, dated August 26, 2016, the accompanying Declaration of Lawrence J. Zweifach, dated August 26, 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 (1) striking the opening and rebuttal reports of Michael G. Mayer in their entirety, and (2) precluding Mayer from testifying.

Dated: New York, New York
August 26, 2016

GIBSON, DUNN & CRUTCHER LLP

By:  _____

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

200 Park Avenue
New York, NY 10166
Telephone: 212.351.4000
Fax: 212.351.4035

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

Counsel for Respondents