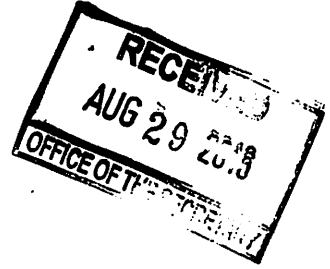


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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



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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

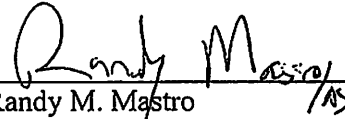
**RESPONDENTS' MOTION *IN LIMINE* TO STRIKE IN ITS ENTIRETY THE
REBUTTAL REPORT OF DIVISION OF ENFORCEMENT EXPERT IRA WAGNER,
TO STRIKE PORTIONS OF WAGNER'S OPENING REPORT, AND TO PRECLUDE
TESTIMONY ON THE STRICKEN MATTERS AND RELATED TOPICS**

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 rebuttal report of Ira Wagner in its entirety; (2) striking the portions of Wagner's opening report highlighted in Exhibit 2 of the Zweifach Declaration; and (3) precluding Wagner from testifying as to the stricken matters and related topics.

Dated: New York, New York
August 26, 2016

GIBSON, DUNN & CRUTCHER LLP

By:

A handwritten signature in black ink, appearing to read "Randy M. Mastro", is written over a horizontal line. The signature is cursive and somewhat stylized.

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