

# HARD COPY

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

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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. :  
 :  
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**RESPONDENTS' MOTION TO COMPEL MBIA TO PRODUCE DOCUMENTS  
RESPONSIVE TO RESPONDENTS' SUBPOENAS**

Pursuant to Rule 111 of the U.S. Securities and Exchange Commission (the "Commission") Rules of Practice (the "Rules"), 17 C.F.R. § 201.100 et seq., upon the accompanying Memorandum of Law and the accompanying Declaration of Lisa H. Rubin, both dated October 5, 2016, and the record of the proceedings herein, Respondents Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners VIII, LLC, Patriarch Partner XIV, LLC, and Patriarch Partners XV, LLC (collectively, "Respondents") respectfully move for an order compelling MBIA to produce documents responsive to Respondents' subpoenas.

Dated: New York, New York  
October 5, 2016

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