

FROST BROWN TODD LLP

Rebecca Matthews (Tex. Bar No. 24062776)
2101 Cedar Springs Road, Suite 900
Dallas, TX 75201
Telephone: (214) 580-8608
Email: rmatthews@fbtlaw.com

GOLDBERG KOHN LTD.

Danielle W. Juhle (admitted *pro hac vice*)
Randall L. Klein (admitted *pro hac vice*)
Nicole P. Bruno (admitted *pro hac vice*)
55 East Monroe Street, Suite 3300
Chicago, IL 60603
Telephone: (312) 201-4001
Email: danielle.juhle@goldbergkohn.com
randall.klein@goldbergkohn.com
nicole.bruno@goldbergkohn.com

Attorneys for Fifth Third Bank, National Association

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	:	Chapter 7
	:	
TRICOLOR HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 25-33487-MVL
	:	
Debtor.	:	(jointly administered)

LIMITED OBJECTION AND RESERVATION OF RIGHTS

Fifth Third Bank, National Association (“Fifth Third”), in its capacities set forth in the *Notice of Appearance and Request for Notices* [Docket No. 7], files this Limited Objection and Reservation of Rights (the “Objection”) to *Salehoun Family L.P.’s Motion for Relief from*

¹ The Debtors in these chapter 7 cases are as follows: Tricolor Holdings, LLC, TAG Intermediate Holding Company, LLC, Tricolor Auto Group, LLC, Tricolor Auto Acceptance, LLC, Tricolor Insurance Agency, LLC, Tricolor Home Loans LLC dba Tricolor Mortgage, Tricolor Real Estate Services, LLC, TAG California Holding Company, LLC, Flexi Compras Autos, LLC, TAG California Intermediate Holding Company, LLC, Tricolor California Auto Group, LLC, Tricolor California Auto Acceptance, LLC, Risk Analytics LLC, Tricolor Tax, LLC, Tricolor Financial, LLC, Tricolor Auto Receivables LLC, TAG Asset Funding, LLC, and Apoyo Financial, LLC.



Automatic Stay [Docket No. 106] (the “Motion” and Salehoun Family L.P., the “Movant”),² and states as follows in support thereof:

Fifth Third objects to the Movant’s attempt to exercise any purported rights or remedies that would include transferring, liquidating, or otherwise exercising any control (directly or indirectly) over any vehicles or other property owned by, or pledged to, Fifth Third (collectively, “Warehouse Property”) established in connection with the warehouse facility for which Fifth Third serves as administrative agent. Movant has no claim to the Warehouse Property and, accordingly, the Motion, to that extent, is improper and should be denied.

In the event this Court is inclined to grant the Motion, any order granting same should include the following language: “Nothing herein shall (i) be deemed to modify, amend, minimize, impact or otherwise effect Fifth Third’s rights, claims and interests of, in, and to the Warehouse Property, and as against all persons and entities, and (ii) authorize or empower the Movant to transfer, liquidate or otherwise exercise any control (directly or indirectly) over any of the Warehouse Property. Movant shall coordinate with Fifth Third with respect to the prompt turnover by Movant of the Warehouse Property. This Court retains jurisdiction to adjudicate any disputes related to this order.”

Furthermore, Fifth Third reserves all rights, remedies and arguments as against all persons and entities.

[Remainder of page left intentionally blank]

² Capitalized terms used, but not defined herein, shall have the meaning ascribed to such term in the Motion.

Respectfully submitted,

FROST BROWN TODD LLP

Dated: October 10, 2025

By: /s/ Rebecca Matthews
Rebecca Matthews (Tex. Bar No. 24062776)
2101 Cedar Springs Road, Suite 900
Dallas, TX 75201
Telephone: (214) 580-8608
Email: rmatthews@fbtlaw.com

-and-

GOLDBERG KOHN LTD.

Danielle W. Juhle (admitted *pro hac vice*)
Randall L. Klein (admitted *pro hac vice*)
Nicole P. Bruno (admitted *pro hac vice*)
55 East Monroe Street, Suite 3300
Chicago, IL 60603
Telephone: (312) 201-4001
Email: danielle.juhle@goldbergkohn.com
randall.klein@goldbergkohn.com
nicole.bruno@goldbergkohn.com

Attorneys for Fifth Third Bank, National Association

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2025, a true and correct copy of the foregoing Limited Objection and Reservation of Rights was sent via ECF Noticing to all parties receiving ECF Notices in this chapter 7 case.

/s/ Rebecca L. Matthews
Rebecca L. Matthews