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Attorneys for the SPV 4 Agent

**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
	:	
Debtors.	:	(jointly administered)

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.



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**JOINDER OF THE SPV 4 AGENT TO
WILMINGTON TRUST’S LIMITED OBJECTION TO
SALEHOUN FAMILY L.P.’S MOTION FOR RELIEF FROM AUTOMATIC STAY**

JPMorgan Chase Bank, N.A., (the “SPV 4 Agent”) in its capacity as administrative agent under the Credit Agreement, dated as of November 13, 2020, among non-Debtor Tricolor Funding SPV4 LLC (the “SPV 4 Borrower”), Tricolor Auto Acceptance, LLC as initial servicer (“TAA”), the lenders from time to time party thereto (the “SPV 4 Lenders”), the agents from time to time party thereto, Vervent, Inc. as initial back-up server, and Wilmington Trust, National Association as account bank, files this Joinder (this “Joinder”) to *Limited Objection and Reservation of Rights to Salehoun Family L.P.’s Motion for Relief from Automatic Stay* [Docket No. 178] (the “Limited Objection”),² and states as follows in support thereof:

The SPV 4 Agent acts as administrative agent for the SPV 4 Lenders under the warehouse loan facility provided to the SPV 4 Borrower, a non-Debtor subsidiary of TAA. The SPV 4 Agent joins in the arguments and adopts those arguments as its own (as applicable) of Wilmington Trust’s Limited Objection to the extent Movant’s requested relief attempts or authorizes Movant to exercise any remedies, rights or control (directly or indirectly) over any vehicles or other property owned by, or pledged to, the SPV 4 Borrower, the SPV 4 Agent or any SPV 4 Lender (collectively, “SPV 4 Property”) in connection with such warehouse loan facility.

The SPV 4 Agent is not currently able to verify if any SPV 4 Property is located at the Premises. Nonetheless, in the event this Court is inclined to grant the Motion, the SPV 4 Agent further joins the Limited Objection by requesting that all of the rights and remedies of the SPV 4 Borrower, the SPV 4 Agent and the SPV 4 Lenders in and over any SPV 4 Property located at the

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

Premises be fully preserved and that Movant may not exercise any rights, remedies or control over such SPV 4 Property.

The SPV 4 Agent and SPV 4 Lenders reserve all of their respective rights, remedies and arguments as against all persons and entities.

HUNTON ANDREWS KURTH LLP

Dated: October 10, 2025

By: /s/ Timothy A. ("Tad") Davidson II

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CERTIFICATE OF SERVICE

I certify that on October 10, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

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