

MCDERMOTT WILL & SCHULTE LLP

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
Michael Wombacher (TX Bar No. 24120434)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Telephone: 214.295.8000
E-mail: cr gibbs@mwe.com
mhelt@mwe.com
gwilliams@mwe.com
mwombacher@mwe.com

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: 212-547.5400
E-mail: dazman@mwe.com

Proposed Counsel to the Chapter 7 Trustee

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

In re:

TRICOLOR HOLDINGS, LLC, *et al.*,¹

Debtors.

)
) Chapter 7
)
) Case No. 25-33487 (MVL)
)
)
)
)

**NOTICE OF AGREED EXTENSION
OF OBJECTION DEADLINE**

PLEASE TAKE NOTICE that on September 26, 2025, Salehoun Family L.P. (the “Lessor”) filed the *Salehoun Family L.P.’s Motion for Relief from Automatic Stay* (the “Motion”), which provides a deadline to object to the Motion by close of business on October 10, 2025 (the “Objection Deadline”) [Docket No. 106].

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, Tricolor Asset Funding, LLC, and Apoyo Financial, LLC.



PLEASE TAKE FURTHER NOTICE that after good faith discussions, the Lessor and the Trustee have agreed to extend the Objection Deadline. The Objection Deadline is extended for the Trustee to close of business on **Monday, November 10, 2025**.

Dated: October 11, 2025
Dallas, Texas

MCDERMOTT WILL & SCHULTE LLP

/s/ Charles R. Gibbs

Charles R. Gibbs (TX Bar No. 7846300)
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mhelt@mwe.com
gwilliams@mwe.com
mwombacher@mwe.com

-and-

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
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CERTIFICATE OF SERVICE

I do hereby certify that on October 11, 2025, a true and correct copy of the foregoing document was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this.

/s/ Charles R. Gibbs

Charles R. Gibbs