Christopher J. Schreiber, Esq. Wisconsin Bar No. 1039091 MICHAEL BEST & FRIEDRICH LLP 790 N. Water Street, Suite 2500 Milwaukee, WI 53202-4108 Tel (414) 225-8284 cischreiber@michaelbest.com

Jamie R. Welton, Esq. Texas Bar No. 24013732 Texas License Date: 11/03/1999 JAMIE R. WELTON PC Dallas, TX 75230-3117 Phone: (214) 500-7625 irw@weltonpc.com

Counsel to Varilease Finance. Inc.

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

| In re: |) | Chapter 7 |
|---------------------------------|---|-------------------------|
| TRICOLOR HOLDINGS, LLC, et al.1 |) | Case No. 25-33487 (MVL) |
| Debtor. |) | |
| |) | |

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, that the law firm of Michael Best & Friedrich LLP, through Christopher J. Schreiber, hereby appears as counsel of record in this case for Varilease Finance, Inc. and VFI ABS 2023-1, LLC, as assignee of Varilease Finance, Inc. (together, "Varilease"). Request is hereby made that copies of all notices, pleadings, orders, and all other papers required to be served or mailed (electronically or otherwise) be sent to the undersigned as counsel of record for

¹ The Debtors in these chapter 7 cases are as follows: Tricolor Holdings, LLC, TAG Intermediate Holding Company, LLC (Case No. 25-33495), Tricolor Auto Group, LLC (Case No. 25-33496), Tricolor Auto Acceptance, LLC (Case No. 25-33497), Tricolor Insurance Agency, LLC (Case No. 25-33512), Tricolor Home Loans LLC dba Tricolor Mortgage (Case No. 25-33511), Tricolor Real Estate Services, LLC (Case No. 25-33514), TAG California Holding Company, LLC (Case No. 25-33493), Flexi Compras Autos, LLC (Case No. 25-33490), TAG California Intermediate Holding Company, LLC (Case No. 25-33494), Tricolor California Auto Group, LLC (Case No. 25-33502), Tricolor California Auto Acceptance, LLC (Case No. 25-33501), Risk Analytics LLC (Case No. 25-33491), Tricolor Tax, LLC (Case No. 25-33515), Tricolor Financial, LLC (Case No. 25-33510), Tricolor Auto Receivables LLC (Case No. 25-33498), TAG Asset Funding, LLC (Case No. 25-33492), and Apoyo Financial, LLC (Case No. 25-33489).



Varilease.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers specified above, but also includes, without limitation, any orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, electronically, telephone, facsimile or otherwise, which affect the Debtor, property of the Debtor, or any rights or interest of creditors or parties in interest in this bankruptcy case.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights, without limitation: (a) to require that where any adversary proceeding is to be initiated, service shall be made in accordance with applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (b) to have final orders in non-core matters entered only after *de novo* review by the United States District Court; (c) to have a trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (d) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (e) any other rights, claims, actions, defenses, setoffs or recoupments in law or at equity.

[Signature and Certificate of Service on Next Page]

Respectfully submitted: October 14, 2025.

MICHAEL BEST & FRIEDRICH LLP

By: <u>/s/ Christopher J. Schreiber</u> Christopher J. Schreiber Esq. 790 N. Water Street, Suite 2500 Milwaukee, WI 53202-4108

Phone: 414.225.8284

Email: cjschreiber@michaelbest.com

Counsel to Varilease Finance, Inc. and VFI ABS 2023-1, LLC, as assignee of Varilease Finance, Inc

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, a true and correct copy of the foregoing Notice of Appearance and Request for Notice was sent via ECF Noticing to all parties receiving ECF Notices in this chapter 7 case.

By: /s/ Christopher J. Schreiber