

**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. 25-33487-7-mvl7

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appear in the above-captioned chapter 7 proceeding as counsel on behalf of 603 San Fernando Road, LLC (“Landlord”) and request that all notices given or required to be given in this proceeding, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone or otherwise, to be served upon:

FROST BROWN TODD LLP

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-and-

¹ The Debtors and their bankruptcy case numbers are: Tricolor Holdings, LLC (25-33487), TAG Intermediate Holding Company, LLC (25-33495), Tricolor Auto Group, LLC (25-33496), Tricolor Auto Acceptance, LLC (25-33497), Tricolor Insurance Agency, LLC (25-33512), Tricolor Home Loans LLC (25-33511), Tricolor Real Estate Services (25-33514), TAG California Holding Company, LLC (25-33493), Flexi Compras Autos, LLC (25-33490), TAG California Intermediate Holding Company, LLC (25-33494), Tricolor California Auto Group, LLC (25-33502), Tricolor California Auto Acceptance, LLC (25-33501), Risk Analytics LLC (25-33491), Tricolor Tax, LLC (25-33515), Tricolor Financial, LLC (25-33510), Tricolor Auto Receivables LLC (25-33498), TAG Asset Funding, LLC (25-33492), Apoyo Financial, LLC (25-33489).



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PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as nor is it a consent to jurisdiction of the Bankruptcy Court over Landlord, specifically but not limited to (i) their right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) their right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) their right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Landlord is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments they expressly reserve.

Date: October 17, 2025

Respectfully submitted,

FROST BROWN TODD LLP

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Counsel for 603 San Fernando Road, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of October, 2025, a true and correct copy of the foregoing ***Notice of Appearance and Request for Notices*** was sent via ECF Noticing to all parties receiving ECF Notices in this chapter 7 case.

/s/ Rebecca L. Matthews
Rebecca L. Matthews