

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

In Re: TRICOLOR HOLDINGS, LLC, et
al.¹

Chapter 11

Case No.: 25-33487-7-mvl

(Jointly Administered)

Debtor(s)

APPLICATION FOR ADMISSION *PRO HAC VICE*

1. Name: Gold, Ivan M.

*Last**First**MI*
2. Firm Name: Allen Matkins Leck Gamble Mallory & Natsis LLP
3. Address: Three Embarcadero Center, 12th Floor
San Francisco, CA 94111-4074
4. Phone: (415) 273-7431 FAX: (415) 837-1516
Email: igold@allenmatkins.com
5. Name used to sign *all* pleadings: Ivan M. Gold
6. Retained by: 603 San Fernando Road, LLC
7. Admitted on December 10, 1985 and presently a member in good standing
of the bar of the highest court of the state of California
and issued the bar license number of 121486.
8. Admitted to practice before the following courts:

<i>Court:</i> <u>Northern District of California</u> <u>Eastern District of California</u> <u>Central District of California</u>	<i>Admission Date:</i> <u>December 10, 1985</u> <u>July 23, 1987</u> <u>August 14, 1987</u>
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¹ The Debtors and their bankruptcy case numbers are: Tricolor Holdings, LLC (25-33487), TAG Intermedia (25-33496), Tricolor Auto Acceptance, LLC (25-33497), Tricolor Insurance Agency, LLC (25-33512), Tricolor (25-33514), TAG California Holding Company, LLC (25-33493), Flexi Compras Autos, LLC (25-33490), TAG Califo (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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9. Are you presently a member in good standing of the bars of the courts listed above?

☒ Yes ☐ No

If "No," please list all courts which you are no longer admitted to practice:

10. Have you ever been subject to a grievance proceeding or involuntary removal proceeding while a member of the bar of any state or federal court?

☐ Yes ☒ No

If "Yes," please provide details:

11. Other than minor traffic offenses, have you ever been charged, arrested, or convicted of a criminal offense or offenses?

☐ Yes ☒ No

If "Yes," please provide details:

12. Please list all cases in the United States Bankruptcy Court, Northern District of Texas in which you have filed for *pro hac vice* in the past three years:

Date of Application

Case No. and Style

_____ See attached Exhibit A _____

13. Local counsel of record: Rebecca L. Matthews, Esquire

14. Local counsel's address: Frost Brown Todd LLP

2101 Cedar Springs Rd., Dallas, Texas 75201

Continued.

I respectfully request to be admitted to practice in the United States Bankruptcy Court for the Northern District of Texas for this cause only.

I certify that I have read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D. 284 (N.D. Tex. 1988) (en banc), and the local civil and bankruptcy rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil and bankruptcy rules.

☒ I am an ECF filer. I also certify that I have served a true and correct copy of this document upon each attorney of record and filed the application via ECF with the payment of \$100.00

☐ I am not an ECF filer. I also certify that I have served a true and correct copy of this document upon each attorney of record and the original upon the US Bankruptcy Court accompanied with the \$100.00 filing fee on _____.

Ivan M. Gold, Esquire

Printed Name of Applicant

10/17/2025

Date

/s/ Ivan M. Gold

Signature of Applicant

Exhibit A

<i>Date of Application</i>	<i>Case No. and Style</i>
December 20, 2022	22-42808; In re Raymond Justin David Jr.
January 13, 2023	22-30659; Northwest Senior Housing Corporation
September 26, 2023	24-42469; Bela Flor Nurseries
June 28, 2024	24-41977; In re Tres Peliculas, LLC
August 9, 2024	24-80058; In re Buca Texas Restaurants, L.P., et al.
October 29, 2024	24-43689; In re Backyard Environments LLC
September 4, 2025	25-43339; In re Abuelo's International, L.P.