

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

IN RE:	§	Chapter 7
	§	
TRICOLOR HOLDINGS, LLC, et al.,	§	Case No. 25-33487 (MVL)
	§	
Debtors.	§	

**NOTICE OF DEMAND FOR RECLAMATION BY CLAY COOLEY MOTOR
COMPANY**

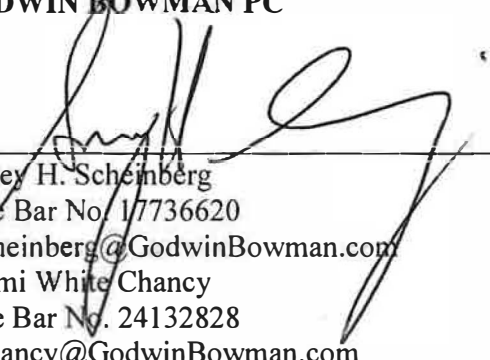
1. On October 20, 2025, Clay Cooley Motor Company, by and through their counsel, made demand on Tricolor Holdings, LLC, et al., for the reclamation of goods via certified mail and first-class mail. Included with said demand were documents related to the said goods Attached to this Notice as Exhibit "A" is a copy of the demand, which is incorporated herein for all intents and purposes.

2. Clay Cooley Motor Company makes this notice of demand pursuant to 11 U.S.C. §§ 502, 503, and 546 and applicable non-bankruptcy law, including, but not limited to, Section 2.702 of the Texas Business & Commerce Code. Clay Cooley Motor Company reserves all rights with respect to the goods referenced herein and reserves the right to assert any additional rights they may have under applicable law, including their right to administrative expense payment status for all goods received by the Debtors pursuant to 11 U.S.C § 503(b)(9).



Date: October 20, 2025

Respectfully submitted,
GODWIN BOWMAN PC



BY: _____
Sidney H. Scheinberg
State Bar No. 17736620
SScheinberg@GodwinBowman.com
Naomi White Chancy
State Bar No. 24132828
NChancy@GodwinBowman.com
Godwin Bowman PC
500 N. Akard Street, Suite 1100
Dallas, TX 75201
Ph: (214) 939-4501
Fax: (214) 527-3116
**ATTORNEYS FOR CLAY COOLEY MOTOR
COMPANY**

CERTIFICATE OF SERVICE

A copy of this notice was served on the persons shown on Exhibit "1" at the addresses reflected on that exhibit on October 20, 2025 by prepaid United States first class mail or via ECF Notification.



Sidney H. Scheinberg
Attorney for Clay Cooley Motor Company

EXHIBIT 1

Debtor – via ECF Notification

Tricolor Holdings, LLC, et al.
6021 Connection Drive, 4th Floor
Irving, TX 75039

Debtor's Attorney – via ECF notification

Thomas Robert Califano
Sidley Austin LLP
2021 McKinney Street, Suite 2000
Dallas, TX 75201

U.S. Trustee – via ECF Notification

US Trustee
1100 Commerce Street, Room 976
Dallas, TX 75202



GODWIN | BOWMAN P C

SIDNEY H. SCHEINBERG, SHAREHOLDER
DIRECT DIAL: 214.939.4501
DIRECT FAX: 214.517.3116
SScheinberg@GodwinBowman.com

Attorneys and Counselors

Renaissance Tower
500 N. Akard Street, Suite 1100
Dallas, Texas 75201-3499
214.939.4400
800.662.8393
214.760.7332 Fax

GodwinBowman.com

October 20, 2025

VIA EMAIL AND HAND DELIVERY

Grayson Williams
McDermott Will & Schulte
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201

Re: Reclamation Demand by Clay Cooley Motor Company

To whom it may concern:

I write on behalf of Clay Cooley Motor Company ("Clay Cooley") in connection with certain goods that were sold on credit to and received by Tricolor Holdings, LLC, et al., pursuant to the invoices identified in Exhibit A to this letter (the "Clay Cooley Goods").

Clay Cooley has learned of the insolvency of Tricolor Holdings, LLC, et al. Accordingly, Clay Cooley hereby demands the immediate return of the Clay Cooley Goods pursuant to Section 2-702 of the Uniform Commercial Code, as enacted under Texas Business & Commerce Code §2.702 and in applicable jurisdiction(s), and otherwise applicable law, including, without limitation, in the event of a bankruptcy filing or other comparable proceeding. 11 U.S.C. § 546(c). Demand is further made that the Clay Cooley Goods currently in your possession be protected and segregated by you and not be used for any purpose whatsoever, except by agreement of the parties or pursuant to a court order. You may not sell, dissipate, or commingle the Clay Cooley Goods with any other goods.

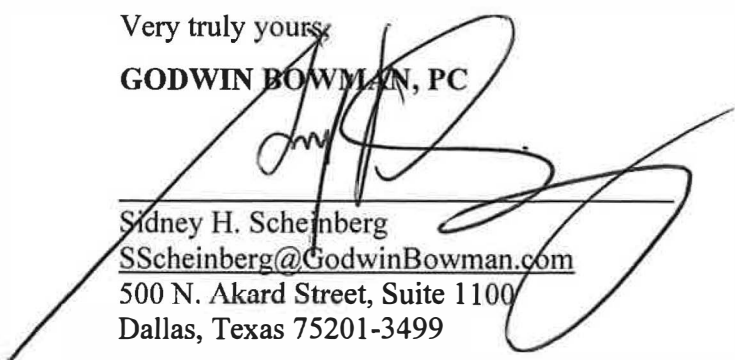
This reclamation demand is made without prejudice to any other rights or remedies available to Clay Cooley at law or in equity (including, without limitation, for payment by Tricolor Holdings, LLC, et al., of any and all amounts due to Clay Cooley), all of which are expressly reserved. Please contact me for instructions regarding the return of the Clay Cooley Goods.

Thank you for your prompt attention to this matter.

October 20, 2025
Page 2

Very truly yours,

GODWIN BOWMAN, PC



Sidney H. Scheinberg
SScheinberg@GodwinBowman.com
500 N. Akard Street, Suite 1100
Dallas, Texas 75201-3499

Attorney for Clay Cooley Motor Company

October 20, 2025

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EXHIBIT A

Invoice Number	PO #	Total
2978	R179398	\$ 974.70
3020	R168062	\$ 120.14
3022	R185860	\$ 126.50
3053	R187772	\$ 110.65
3070	P162402	\$ 494.30
3089	R187593	\$ 188.48
3094	R187606	\$ 341.06
3097	P189194	\$ 223.46
3120	R187400	\$ 478.88
3126	R186189	\$ 106.05
3136	P190055	\$ 42.92
3149	R184342	\$ 34.42
3164	R188431	\$ 21.64
3195	R188796	\$ 97.82
29142	R161415	\$ 92.45
29171	R188805	\$ 529.69
29172	R189992	\$ 102.66
29214	R188805	\$ 136.94
29219	R186871	\$ 136.94
301716	R159920	\$ 557.60
301719	P169398	\$ 219.48
303319	R177762	\$ 134.43
303380	R185114	\$ 25.68
303394	R185860	\$ 11.42
303419	R187772	\$ 515.17
303420	R184700	\$ 77.02
303421	R185580	\$ 53.48
303438	R185490	\$ 401.28
303468	R185266	\$ 82.36
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1528882	R186810	\$ 418.62
1528969	R181708	\$156.60
1528972	R180783	\$ 217.39
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1529016	R181690	\$ 19.92
1529030	R186058	\$ 16.68
1529043	R183821	\$ 75.44
1529098	R182496	\$ 55.68
1529119	R186556	\$ 112.39
1529138	R184811	\$ 256.03

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1529145	P189453	\$ 198.97
1529183	R185717	\$ 15.43
1529187	R187310	\$ 157.12
1529209	R187151	\$ 61.44
1529212	R183810	\$ 99.50
1529218	R186794	\$ 409.73
1529264	R183787	\$ 71.21
1529267	R181691	\$ 352.59
1529300	R188008	\$ 33.80
1529308	R188008	\$ 698.67
1529310	R185602	\$ 311.65
1529348	R186995	\$ 171.27
1529368	R187882	\$ 790.04
1529379	R186854	\$ 639.82
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1529413	R181609	\$ 1,164.09
1529443	R188008	\$ 426.22
1529448	R146282	\$ 1,027.90
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1529482	R188324	\$ 127.99
1529484	R184693	\$ 100.19
1529496	R169017	\$ 119.60
1529505	R187745	\$ 466.84
1529507	R187926	\$ 430.44
1529564	R188637	\$ 34.41
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1529588	R188795	\$ 432.31
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1529858	P157762	\$ 328.43
1529887	R185899	\$ 51.11
1530002	R186667	\$ 47.72
1530040	R188008	\$ 98.82
1530346	R181609	\$ 3.65

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Page 5

1530383	R172590	\$ 382.80
1530387	R191307	\$ 141.09
1530411	R191279	\$ 761.63
3212	R189112	\$ 20.14
3251	R186448	\$ 393.60
3259	R189100	\$ 555.37
3262	R189557	\$ 843.81
3274	P191160	\$ 82.93
3281	R188615	\$ 539.33
3300	R189898	\$ 237.91
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3309	R186448	\$ 680.54
3311	R186189	\$54.41
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3387	R174698	\$ 325.06
41661	R181149	\$ 1.07
41684	R187001	\$ 16.62
41713	R185052	\$ 58.25
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41728	R179803	\$ 31.75
41747	R185929	\$ 20.10
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41771	R187418	\$ 725.02
41778	R189237	\$ 435.49
41781	R187592	\$ 96.88
41887	R190978	\$ 172.10
48844	R186561	\$ 39.98
48870	R184054	\$ 16.69
48910	R186561	\$ 37.64
48938	R183677	\$ 23.61
48953	R184054	\$ 56.14
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49067	R181965	\$ 27.53
59271	R186561	\$ 5.50
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339574	R186514	\$ 104.80
339647	R187347	\$ 413.60
339739	R168570	\$ 60.88
339757	R187070	\$ 166.00
340033	P191177	\$ 331.08
340065	R188371	\$ 214.56
340149	P191177	\$ 186.56
340232	R190610	\$ 62.72

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340358	R188545	\$ 21.72
340360	R189558	\$ 62.32
340427	R189558	\$ 84.80
340476	P193465	\$ 17.40
340500	R186496	\$ 475.60
630298	R184779	\$ 1,306.55
630322	R164089	\$ 303.95
630341	P188302	\$ 84.64
630352	R185236	\$ 417.66
630370	R186841	\$ 262.14
630377	R186953	\$ 225.73
630386	R187136	\$ 152.61
630390	R184731	\$ 311.58
630416	R187169	\$ 602.88
630437	R186416	\$ 109.42
630464	R187419	\$ 14.70
630497	R187903	\$ 94.12
630507	R187920	\$ 267.02
630509	R187403	\$ 67.58
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630530	R180805	\$ 467.44
630531		\$ 20.39
630570	R169174	\$ 56.09
630576	R188445	\$ 21.98
630577	P190288	\$ 301.49
630578-1	R186564	\$ 485.44
630578-2	R186564	\$ 146.12
630586	P189369	\$ 1,530.00
630593	P187655	\$ 505.60
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630613	R187680	\$ 99.67
630620	R187985	\$ 42.33
630635	R1879919	\$ 65.68
630639	R187169	\$ 46.12
630462	P190534	\$ 15.52
630645	R187931	\$ 173.94
630685	R170932	\$ 353.94
630686	R185693	\$ 616.86
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630709	R186564	\$ 43.38
630723	P190288	\$ 472.68
630730	R188776	\$ 559.38
630743	P190054	\$ 120.00
630757	R185693	\$ 310.59
630758	R185693	\$ 310.59

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630761	R188988	\$ 160.34
630762	R185557	\$ 74.49
630763	R188988	\$ 151.58
630779	R185693	\$ 342.84
630780	R187169	\$ 64.80
630794	P1900537	\$ 22.44
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630863	P182190	\$ 141.39
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630897	088473	\$ 257.48
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631181	R189751	\$ 77.05
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747660	R178802	\$ 91.82
748109	R174575	\$ 185.77
748378	P184382	\$ 170.31
748402	P173980	\$ 21.91
748403	R185708	\$ 113.79
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748497	P147639	\$ 235.08
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748562	R18539	\$ 400.69
748600	R179045	\$ 311.54
748629	R185311	\$ 384.13
748664	R188418	\$ 26.76

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748667	R188756	\$ 963.67
748681	R186480	\$ 16.77
748892	R178882	\$ 517.18
749101	R174889	\$ 85.24
749113	R187881	\$ 192.41
749296	P184921	\$ 24.22
749298	R191525	\$ 193.73
749308	R191314	\$ 27.75
		\$ 95,355.81

GODWIN | BOWMAN P C

Attorneys and Counselors

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October 20, 2025

VIA EMAIL AND HAND DELIVERY

Grayson Williams
McDermott Will & Schulte
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201

Re: Reclamation Demand by Clay Cooley Motor Company

To whom it may concern:

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Clay Cooley has learned of the insolvency of Tricolor Holdings, LLC, et al. Accordingly, Clay Cooley hereby demands the immediate return of the Clay Cooley Goods pursuant to Section 2-702 of the Uniform Commercial Code, as enacted under Texas Business & Commerce Code §2.702 and in applicable jurisdiction(s), and otherwise applicable law, including, without limitation, in the event of a bankruptcy filing or other comparable proceeding. 11 U.S.C. § 546(c). Demand is further made that the Clay Cooley Goods currently in your possession be protected and segregated by you and not be used for any purpose whatsoever, except by agreement of the parties or pursuant to a court order. You may not sell, dissipate, or commingle the Clay Cooley Goods with any other goods.

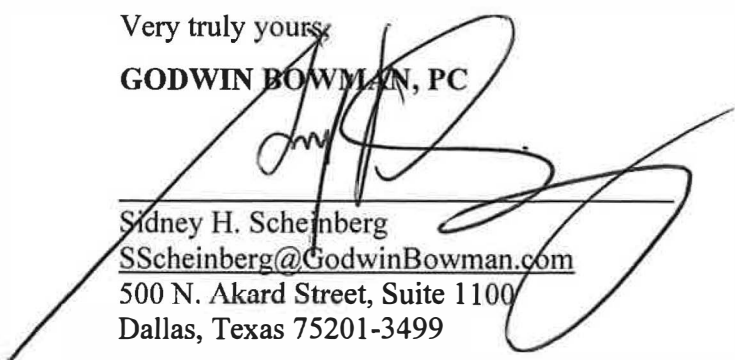
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Attorney for Clay Cooley Motor Company

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3164	R188431	\$ 21.64
3195	R188796	\$ 97.82
29142	R161415	\$ 92.45
29171	R188805	\$ 529.69
29172	R189992	\$ 102.66
29214	R188805	\$ 136.94
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303492	R186189	\$ 80.57
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1529098	R182496	\$ 55.68
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1529138	R184811	\$ 256.03

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Page 4

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1529308	R188008	\$ 698.67
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1529348	R186995	\$ 171.27
1529368	R187882	\$ 790.04
1529379	R186854	\$ 639.82
1529382	R188390	\$ 16.68
1529395	R188619	\$ 454.32
1529407	R181696	\$ 375.18
1529413	R181609	\$ 1,164.09
1529443	R188008	\$ 426.22
1529448	R146282	\$ 1,027.90
1529472	R186415	\$ 50.70
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1529484	R184693	\$ 100.19
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1529582	R188619	\$ 92.99
1529588	R188795	\$ 432.31
1529599	R187882	\$ 331.12
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1529632	R188620	\$ 180.69
1529723	R184339	\$ 44.61
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1529794	R187928	\$ 739.17
1529795	P176217	\$ 139.36
1529843	R189706	\$ 61.84
1529855	R189944	\$ 650.32
1529858	P157762	\$ 328.43
1529887	R185899	\$ 51.11
1530002	R186667	\$ 47.72
1530040	R188008	\$ 98.82
1530346	R181609	\$ 3.65

October 20, 2025

Page 5

1530383	R172590	\$ 382.80
1530387	R191307	\$ 141.09
1530411	R191279	\$ 761.63
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3262	R189557	\$ 843.81
3274	P191160	\$ 82.93
3281	R188615	\$ 539.33
3300	R189898	\$ 237.91
3304	R186658	\$ 20.04
3307	R188797	\$ 312.05
3309	R186448	\$ 680.54
3311	R186189	\$54.41
3282	R188544	\$ 590.14
3387	R174698	\$ 325.06
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41713	R185052	\$ 58.25
41720	R188536	\$ 62.34
41723		\$41723
41728	R179803	\$ 31.75
41747	R185929	\$ 20.10
41769		\$ 13.69
41771	R187418	\$ 725.02
41778	R189237	\$ 435.49
41781	R187592	\$ 96.88
41887	R190978	\$ 172.10
48844	R186561	\$ 39.98
48870	R184054	\$ 16.69
48910	R186561	\$ 37.64
48938	R183677	\$ 23.61
48953	R184054	\$ 56.14
49025	R169846	\$ 70.66
49067	R181965	\$ 27.53
59271	R186561	\$ 5.50
339421	R181339	\$ 6.52
339574	R186514	\$ 104.80
339647	R187347	\$ 413.60
339739	R168570	\$ 60.88
339757	R187070	\$ 166.00
340033	P191177	\$ 331.08
340065	R188371	\$ 214.56
340149	P191177	\$ 186.56
340232	R190610	\$ 62.72

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340358	R188545	\$ 21.72
340360	R189558	\$ 62.32
340427	R189558	\$ 84.80
340476	P193465	\$ 17.40
340500	R186496	\$ 475.60
630298	R184779	\$ 1,306.55
630322	R164089	\$ 303.95
630341	P188302	\$ 84.64
630352	R185236	\$ 417.66
630370	R186841	\$ 262.14
630377	R186953	\$ 225.73
630386	R187136	\$ 152.61
630390	R184731	\$ 311.58
630416	R187169	\$ 602.88
630437	R186416	\$ 109.42
630464	R187419	\$ 14.70
630497	R187903	\$ 94.12
630507	R187920	\$ 267.02
630509	R187403	\$ 67.58
630528	R187680	\$ 46.46
630530	R180805	\$ 467.44
630531		\$ 20.39
630570	R169174	\$ 56.09
630576	R188445	\$ 21.98
630577	P190288	\$ 301.49
630578-1	R186564	\$ 485.44
630578-2	R186564	\$ 146.12
630586	P189369	\$ 1,530.00
630593	P187655	\$ 505.60
63060	R173907	\$ 205.34
630613	R187680	\$ 99.67
630620	R187985	\$ 42.33
630635	R1879919	\$ 65.68
630639	R187169	\$ 46.12
630462	P190534	\$ 15.52
630645	R187931	\$ 173.94
630685	R170932	\$ 353.94
630686	R185693	\$ 616.86
630689	R188777	\$ 196.66
630709	R186564	\$ 43.38
630723	P190288	\$ 472.68
630730	R188776	\$ 559.38
630743	P190054	\$ 120.00
630757	R185693	\$ 310.59
630758	R185693	\$ 310.59

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630761	R188988	\$ 160.34
630762	R185557	\$ 74.49
630763	R188988	\$ 151.58
630779	R185693	\$ 342.84
630780	R187169	\$ 64.80
630794	P1900537	\$ 22.44
630803	R184779	\$ 230.84
630858	R182351	\$ 356.31
630861	R184779	\$ 172.85
630863	P182190	\$ 141.39
630883	R188776	\$ 104.39
630897	088473	\$ 257.48
630903	R189782	\$ 8.66
630938	R184779	\$ 30.46
630950	R187511	\$105.35
630954	R167214	\$ 155.06
630958	R176725	\$ 74.51
630959	R188434	\$ 247.80
630982	192173	\$ 61.55
631060	R187333	\$ 22.55
631071	R186824	\$ 28.10
631127	R185693	\$ 56.09
631181	R189751	\$ 77.05
631195		\$ 7.06
631221	P192171	\$ 21.49
631241	R189103	\$ 459.93
631310	R188776	\$ 687.50
631336	P190591	\$ 1,029.95
631354	R187333	\$ 49.84
631369	R191246	\$ 165.50
742263	R153434	\$ 15.84
742290	R153434	\$ 15.84
747660	R178802	\$ 91.82
748109	R174575	\$ 185.77
748378	P184382	\$ 170.31
748402	P173980	\$ 21.91
748403	R185708	\$ 113.79
748456	P184382	\$ 510.93
748497	P147639	\$ 235.08
748516	P147639	\$ 235.08
748527	R160911	\$ 10.01
748562	R18539	\$ 400.69
748600	R179045	\$ 311.54
748629	R185311	\$ 384.13
748664	R188418	\$ 26.76

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748667	R188756	\$ 963.67
748681	R186480	\$ 16.77
748892	R178882	\$ 517.18
749101	R174889	\$ 85.24
749113	R187881	\$ 192.41
749296	P184921	\$ 24.22
749298	R191525	\$ 193.73
749308	R191314	\$ 27.75
		\$ 95,355.81