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

In re:	§	Chapter 7
	§	
TRICOLOR HOLDINGS, LLC, <i>et al</i> ¹ ,	§	Case No. 25-33487 (MVL)
	§	
Debtors.	§	(Jointly Administered)
	§	

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).



EMERGENCY MOTION FOR STATUS CONFERENCE
FILED BY CERTAIN LANDLORD PARTIES

TO THE HONORABLE MICHELLE V. LARSON, U.S. BANKRUPTCY JUDGE:

ANC Ventures, LTD (“ANC”), Bullish Resources, Inc. (“Bullish”), 603 San Fernando Road, LLC (“603 San Fernando”), CICF III TX1B01, LLC (“Cabot”), and BV NWH, LP (“BV NWH,” and collectively, with ANC, Bullish, 603 San Fernando, and Cabot, the “Movant Landlords”), file this *Emergency Motion for Status Conference* (the “Motion”). In support of the Motion, the Movant Landlords respectfully state as follows:

INTRODUCTION

Section 105(d)(1) of the Bankruptcy Code authorizes the Court on its own motion or on the request of a party in interest to “hold such status conferences as are necessary to further the expeditious and economical resolution of the case.” In the interest of the expeditious and economical resolution of certain pending matters in these cases, the Movant Landlords request that the Court set a status conference to discuss scheduling with regard to the Motions to Compel (as defined below). The Movant Landlords request that the Court set a status conference on or before Wednesday October 29, 2025.

BACKGROUND

1. On September 10, 2025 (the “Petition Date”), the Debtors filed their petition for relief under Chapter 7 of Title 11 of the Bankruptcy Code. On the Petition Date, Anne Elizabeth Burns (the “Trustee”) was appointed as the Chapter 7 Trustee in the instant cases.

2. On October 17, 2025, 603 San Fernando filed its *Motion of 603 San Fernando Road, LLC to Compel Payment of Post-Petition Lease Obligations* (“603 San Fernando’s Motion to Compel”) [Docket No. 226].

3. On October 20, 2025, the ANC/Bullish filed their *Amended Motion for Order Directing the Trustee to Pay Post-Petition Rent or Alternatively Compelling the Trustee to Reject Certain Nonresidential Leases* (“ANC/Bullish Landlords’ Motion to Compel”) [Docket No. 229].

4. On October 21, 2025, Cabot filed its *Motion for Order Directing the Trustee to Pay Post-Petition Rent or Alternatively to Compel the Trustee to Reject the Nonresidential Wilmer Lease* (“Cabot’s Motion to Compel”) [Docket No. 245].

5. On October 21, 2025, BV NWH filed its *Motion to Compel Rejection of Lease and Abandonment of Personal property Remaining on Premises and for Allowance and Payment of Administrative Expense Claim* (“BV NWH’s Motion to Compel,” and collectively, with 603 San Fernando’s Motion to Compel, ANC/Bullish Landlords’ Motion to Compel, and Cabot’s Motion to Compel, the “Motions to Compel”) [Docket No. 247].

6. In addition to the Motions to Compel, there are no less than a dozen motions for relief from stay and related requests for relief arising from the Trustee’s non-payment of post-petition rent currently pending and filed by non-residential landlords in substantially similar situations as the Movant Landlords. *See* Docket Nos. 106, 140, 162, 168, 184, 187, 197, 200, 202, 214, 215, 231, and 243. A status conference would streamline resolution of these various motions, identify common issues of law and fact, and coordinate briefing and hearing schedules, promoting judicial economy with respect to the resolutions of these motions.

7. The Movant Landlords have conferred with the Trustee and believe that given the common legal and factual issues underlying the pending Motions to Compel, the associated objection and response deadlines thereto, and the statutory mandate set forth in Section 365(d)(3) of the Bankruptcy Code, pursuant to Section 105(d)(1), a status conference would be beneficial to the Court, the Movant Landlords, and the Trustee. The requested status conference is proposed in

order to explore setting an expedited common hearing and deadlines associated therewith for the expeditious and economic resolution of the Motions to Compel, in addition to other pending matters, and would serve the best interests of the Movant Landlords and the Estates.

PRAYER FOR RELIEF

WHEREAS, the Movant Landlords hereby request that, pursuant to Section 105(d)(1), the Court schedule a status conference on or before October 29, 2025, or at another time convenient for the Court, and grant such further and other relief to which the Movant Landlords may show themselves to be entitled.

Dated: October 23, 2025

/s/ Michael S. Held

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/s/ Ivan M. Gold

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CERTIFICATE OF CONFERENCE

I hereby certify that on the 23rd day of October 2025, I conferred with Eric Steitz, counsel for the Chapter 7 Trustee, who indicated that the Trustee is not conceptually opposed to the relief requested herein.

/s/ Michael S. Held

Michael S. Held

CERTIFICATE OF SERVICE

The is to certify that on the 23rd day of October 2025, a true and correct copy of the foregoing was served upon all parties receiving notice pursuant to the Court's ECF notification system.

/s/ Beau H. Butler

Beau H. Butler

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Debtors.	§	(Jointly Administered)
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ORDER GRANTING EMERGENCY MOTION FOR STATUS CONFERENCE

CAME ON FOR CONSIDERATION, the Emergency Motion for Status Conference (“Motion”). The Court, having reviewed same, and found that notice of the Motion was proper, is of the opinion that that Motion should be GRANTED. It is therefore ORDERED

1. That a Status Conference has been set on the Motions to Compel (as defined in the Motion”) for October 29, 2025 at _____.

###End of Order ###

² 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).

PREPARED AND SUBMITTED BY:

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