

Vincent Renda, Esq. (TX Bar #24087061)

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Attorneys for Gary Lewis Polakoff, Trustee of the Gary and Diane Polakoff 2401 Trust

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

IN RE:	)	
	)	
TRICOLOR HOLDINGS, LLC,	)	Chapter 7
	)	
Debtor.	)	Case No: 25-33487 (MVL)
	)	
GARY LEWIS POLAKOFF,	)	
TRUSTEE OF THE GARY AND	)	
DIANE POLAKOFF 2401 TRUST,	)	
	)	
Movant	)	
	)	
vs.	)	
	)	
Anne Elizabeth Brunes,	)	
Chapter 7 Trustee,	)	
	)	
Chapter 7 Trustee/Respondent	)	

**GARY LEWIS POLAKOFF, TRUSTEE OF THE GARY AND DIANE POLAKOFF
2401 TRUST, JOINDER IN EMERGENCY MOTION FOR STATUS CONFERENCE
FILED BY CERTAIN LANDLORD PARTIES**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Gary Lewis Polakoff, Trustee of the Gary and Diane Polakoff 2401 Trust (“Landlord”), a creditor in the above-captioned matter, hereby joins in the Emergency Motion for Status Conference filed by Certain Landlord Parties, filed as Docket #256.

STATEMENT OF FACT

1. On September 10, 2025 (the “Petition Date”), TriColor Holding, LLC (the



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“Debtor”) along with various affiliates filed voluntary petitions for relief under Chapter 7 of the Bankruptcy Code.

2. Anne Elizabeth Burnes was appointed Chapter 7 Trustee (the “Trustee”).

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding under 28 U.S.C. §157(b)(2)(G).

4. Landlord is the owner of the commercial real property located at 2401 National City Blvd, National City, CA 91950 (the “Premises”).

5. Tricolor California Auto Group, LLC (“Tenant”), a Delaware limited liability company, is a tenant of the Premises pursuant to a written lease agreement (the “Lease”).

6. The Lease has been breached by Tenant due to nonpayment of rent and/or other defaults.

CONCLUSION

WHEREFORE, Gary Lewis Polakoff, Trustee of the Gary and Diane Polakoff 2401 Trust, respectfully requests 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 24, 2025

Respectfully submitted,

PINNACLE LEGAL P.C.
Attorneys for Movant

By: /s/ Vincent Renda

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I have caused copies of the foregoing **CREDITOR GARY LEWIS POLAKOFF, TRUSTEE OF THE GARY AND DIANE POLAKOFF 2401 TRUST, JOINDER IN EMERGENCY MOTION FOR STATUS CONFERENCE FILED BY CERTAIN LANDLORD PARTIES** to be served upon all parties registered to receive CM/ECF notices in this case.

/s/ Vincent Renda
Vincent Renda, Esq.