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*Counsel to the Chapter 7 Trustee*

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

In re:

TRICOLOR HOLDINGS, LLC, *et al.*,<sup>1</sup>

Debtor.

)  
) Chapter 7  
)  
) Case No. 25-33487 (MVL)  
)  
)  
)  
)

**CHAPTER 7 TRUSTEE'S NOTICE OF  
PROPOSED ABANDONMENT OF REMAINING PROPERTY**

**PLEASE TAKE NOTICE** that on November 26, 2025, the United States Bankruptcy Court for the Northern District of Texas (the “Court”) so ordered the *Stipulation and Agreed Order for Lease Rejection* [Docket No. 492] (the “Stipulated Order”), entered into by and between Anne Elizabeth Burns, the Chapter 7 trustee (the “Trustee”) of the estates of the above-captioned debtors (the “Debtors”), and CICF III-TX1B01, LLC (“Landlord”). Pursuant

<sup>1</sup> The Debtors in these chapter 7 cases are as follows: Tricolor Holdings, LLC, TAG Intermediate Holding Company, LLC, Tricolor Auto Group, LLC, Tricolor Auto Acceptance, LLC, Tricolor Insurance Agency, LLC, Tricolor Home Loans LLC dba Tricolor Mortgage, Tricolor Real Estate Services, LLC, TAG California Holding Company, LLC, Flexi Compras Autos, LLC, TAG California Intermediate Holding Company, LLC, Tricolor California Auto Group, LLC, Tricolor California Auto Acceptance, LLC, Risk Analytics LLC, Tricolor Tax, LLC, Tricolor Financial, LLC, Tricolor Auto Receivables LLC, TAG Asset Funding, LLC, and Apoyo Financial, LLC.



to the Stipulated Order, that certain Commercial Lease Agreement dated July 9, 2021 between the Landlord and Tricolor Holdings, LLC, as Debtor Tenant, relating to real property located at 3800 N. Interstate 45, Wilmer TX 75172 (the Premises) is deemed rejected, pursuant to section 365 of the Bankruptcy Code, effective no later than November 30, 2025, pursuant to the terms contained in the Stipulated Order.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the terms of the Stipulated Order, Landlord has agreed to hold any remaining property of the Debtors located at the Premises (the “Remaining Property”), for the benefit of the Trustee, and not to remove such Remaining Property until December 15, 2025.

**PLEASE TAKE FURTHER NOTICE** that the Trustee shall abandon (the “Proposed Abandonment”) any Remaining Property at the Premises as of December 15, 2025.

**PLEASE TAKE FURTHER NOTICE** that any party that objects to the Proposed Abandonment of the Remaining Property (an “Abandonment Objection”) must file its objection in writing with the Clerk of the Court and serve a copy of said objection on (i) the Trustee’s undersigned counsel and (ii) counsel for Landlord, Jackson Walker LLP, Attn: Jennifer F. Wertz and Beau H. Butler, 100 Congress Avenue, Suite 1100, Austin, Texas 78701, e-mail: jwertz@jw.com; bbutler@jw.com, by no later than **close of business (prevailing Central Time) on December 15, 2025** (the “Abandonment Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no Abandonment Objections are filed and served by the Abandonment Objection Deadline, Landlord’s obligations pursuant to paragraph 8 of the Stipulated Order shall expire on December 15, 2025, at which time Landlord may keep and/or dispose of any Remaining Property at the Premises in its sole and absolute discretion without further notice or liability to the Landlord, the Debtors, or any party holding

any liens, claims, encumbrances, interests, and rights (including any rights of setoff or recoupment) in such Remaining Property.

Dated: Dallas, Texas  
November 26, 2025

**MCDERMOTT WILL & SCHULTE LLP**

/s/ Eric C. Seitz

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*Counsel to the Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I do hereby certify that on November 26, 2025, a true and correct copy of the foregoing document was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this case.

/s/ Eric C. Seitz

Eric C. Seitz