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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.*,¹

Debtor.

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

**AMENDED LOCAL RULE 9013-1(A) CERTIFICATION FOR
TRUSTEE'S MOTION FOR EXPEDITED CONSIDERATION
OF EMERGENCY MOTION TO (I) SELL ESTATE ASSETS FREE AND CLEAR OF ALL
LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS, (II) ESTABLISH SALE
PROCEDURES, AND (III) GRANTING RELATED RELIEF [DOCKET NO. 456]**

Counsel for the Chapter 7 Trustee (the "Trustee") has conferred with counsel for the Secured Parties² regarding the *Trustee's Motion for Expedited Consideration of Emergency Motion to (I) Sell Estate Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests*,

¹ 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.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion to Expedite (defined *infra*).



(II) Establish Sale Procedures, and (III) Granting Related Relief [Docket No. 456][Docket No. 457] (the “Motion to Expedite”). Counsel for all Secured Parties have affirmatively consented to the relief requested in the Motion to Expedite, namely that a hearing on the Trustee’s Sale Motion be conducted on December 3, 2025.

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Dated: Dallas, Texas
November 26, 2025

MCDERMOTT WILL & SCHULTE LLP

/s/ Charles R. Gibbs

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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/ Charles R. Gibbs

Charles R. Gibbs