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ATTORNEYS FOR THE TEXAS DEPARTMENT
OF MOTOR VEHICLES

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

IN RE:	§	
	§	
TRICOLOR HOLDINGS, LLC, <i>et al.</i> , ¹	§	CHAPTER 7
	§	
DEBTOR.	§	CASE NO. 25-33487-MVL7

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the attorneys set forth below hereby appear as counsel for the Texas Department of Motor Vehicles, by and through the Office of the Attorney General of Texas, pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). The undersigned request that all notices given or required to be given in the above-captioned case (including, but not limited to, all papers filed and served in all adversary proceedings in such case, and to creditors and equity security holders who file with the Court and request that all notices be mailed to them) be given to and served on the following:

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, Tricolor Asset Funding, LLC, and Apoyo Financial, LLC.



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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statement of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in this case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by the undersigned.

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Dated: December 3, 2025

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

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First Assistant Attorney General

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Deputy First Assistant Attorney General

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Deputy Attorney General for Civil Litigation

RACHEL R. OBALDO

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/s/ Stephanie Eberhardt _____

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of December 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically provided notice on all parties requesting notice in this proceeding.

/s/ Stephanie Eberhardt

STEPHANIE EBERHARDT
Assistant Attorney General