

**THE LAW OFFICES OF RICHARD J. CORBI PLLC**

Richard J. Corbi (*pro hac vice* forthcoming)

104 West 40th St., 4th Floor

New York, New York 10018

Tel: (646) 571-2033

Email: rcorbi@corbilaw.com

*Counsel for Mr. Mauricio Delgado*

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

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In re:	:	
	:	Chapter 7
Tricolor Holdings, LLC, <i>et al.</i> , <sup>1</sup>	:	
	:	Case No. 25-33487 (MVL)
Debtors.	:	(Jointly Administered)
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**JOINDER OF MAURICIO DELGADO TO  
DANIEL CHU’S MOTION FOR ORDER AUTHORIZING THE USE OF  
PROCEEDS OF DIRECTORS AND OFFICERS LIABILITY INSURANCE  
POLICIES FOR DEFENSE EXPENSES AND OTHER LOSS AMOUNTS**

Mr. Mauricio Delgado (“Mr. Delgado”), by and through his undersigned counsel, respectfully submits this joinder (“Joinder”) to *Daniel Chu’s Motion for Order Authorizing the Use of Proceeds of Directors and Officers Liability Insurance Proceeds for Defense Expenses and Other Loss Amounts* (the “Motion”)<sup>2</sup> [Doc. Nos. 469 & 470]. In support of this Joinder, Mr. Delgado also submits the Declaration of Justin Weddle (the “Weddle Decl.”) concurrently filed herewith.

<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.

<sup>2</sup> Capitalized terms used herein but not defined shall have the meanings ascribed to them in the Motion.



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In support of this Joinder, Mr. Delgado respectfully states as follows:

1. Mr. Delgado, the former Chief Strategy and Product Officer of Tricolor Holdings, LLC (a Debtor), is covered by the same primary and excess Directors' and Officers' insurance policies that apply to Mr. Chu and that are attached as exhibits to the declarations submitted in support of Mr. Chu's motion. Therefore, Mr. Delgado respectfully joins the Chu Motion and adopts its arguments discussion of relevant legal principles. Those arguments are equally applicable to Mr. Delgado.

2. On November 20, 2025, Travelers sent a letter to Mr. Delgado's counsel, Justin Weddle, confirming coverage for Mr. Delgado, approving of his selection of Weddle Law as his counsel, and approving of Weddle Law's billing rates. *See* Weddle Decl. Since then, undersigned counsel for Mr. Delgado has been engaged with counsel for the Trustee to enter into a consensual stipulation concerning access to the D&O policy proceeds.

3. While Mr. Delgado is confident that a consensual stipulation or other agreement may be reached with the Trustee, nevertheless, Mr. Delgado files this Joinder out of an abundance of caution and to reserve his rights concerning access to the applicable D&O policies.

4. Mr. Delgado reserves his rights to supplement this Joinder.

Dated: December 9, 2025  
New York, New York

**THE LAW OFFICES OF RICHARD J. CORBI PLLC**

By: /s/ Richard J. Corbi  
Richard J. Corbi (*pro hac vice* forthcoming)  
104 West 40th St., 4th Floor  
New York, New York 10036  
Telephone: (646) 571-2033  
Email: rcorbi@corbilaw.com

*Counsel for Mr. Mauricio Delgado*

**Certificate of Service**

I certify that on December 9, 2025, I caused a copy of the foregoing document to be served by Electronic Case Filings System for the United States Bankruptcy Court for the Northern District of Texas.

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By: /s/ Richard J. Corbi

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New York, New York 10018  
Telephone: (646) 571-2033  
Email: rcorbi@corbilaw.com

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Debtors.	:	(Jointly Administered)
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**DECLARATION OF JUSTIN WEDDLE IN SUPPORT OF JOINDER OF MAURICIO DELGADO TO DANIEL CHU’S MOTION FOR ORDER AUTHORIZING THE USE OF PROCEEDS OF DIRECTORS AND OFFICERS LIABILITY INSURANCE POLICIES FOR DEFENSE EXPENSES AND OTHER LOSS AMOUNTS**

I, Justin Weddle, declares as follows:

1. My name is Justin Weddle. I am over the age of 21 years of age and am competent to make this declaration (the “Declaration”) and testify concerning these matters. Except as otherwise stated herein, the facts set forth in this Declaration are true and correct and are within my personal knowledge.

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<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.

2. I am authorized to submit this Declaration in support of Mr. Mauricio Delgado's *Joinder to Daniel Chu's Motion for Order Authorizing the Use of Proceeds of Directors and Officers Liability Insurance Proceeds for Defense Expenses and Other Loss Amounts* [Doc. Nos. 469 & 470], filed concurrently herewith.

3. I am an attorney licensed in the State of New York practicing at the law firm of Weddle Law PLLC. Weddle Law PLLC represents Mr. Delgado.

4. By letter dated November 20, 2025, addressed to me, Travelers provided its confirmation of coverage that it would afford to Mr. Delgado. In that letter, Travelers, *inter alia*, agreed to defend Mr. Delgado and approved of Mr. Delgado's retention of my firm and my firm's proposed hourly billing rates.

5. I hereby declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Dated: December 9, 2025  
New York, New York

By: /s/ Justin Weddle  
Justin Weddle