

THE LAW OFFICES OF RICHARD J. CORBI PLLC

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

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Counsel for Mr. Mauricio Delgado

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

-----	X	
In re:	:	
	:	Chapter 7
Tricolor Holdings, LLC, <i>et al.</i> , ¹	:	
	:	Case No. 25-33487 (MVL)
Debtors.	:	(Jointly Administered)
-----	X	

**MOTION TO WAIVE LOCAL COUNSEL
REQUIREMENT UNDER L.B.R. 2090-4**

The undersigned attorney for Mr. Mauricio Delgado (“**Mr. Delgado**”), files this motion to waive the local requirement for Richard J. Corbi of The Law Offices of Richard J. Corbi PLLC (“Corbi Law”), under Rule 2090-4 of the Local Rules of the United States Bankruptcy Court for the Northern District of Texas (“**LBR**”)

1. On September 10, 2025, Tricolor Holdings LLC and certain of its affiliates filed petitions under Chapter 7 of the Bankruptcy Code.

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.



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2. Mr. Corbi does not reside or maintain an office within 50 miles of the Dallas Division of the Northern District of Texas.

3. Mr. Corbi maintains an office in New York, NY and is a member of the bar of the State of New York, in good standing, and admitted to practice in the Bankruptcy Courts of the Southern District of New York as well as the Third and Fifth Circuit Courts of Appeals.

4. Mr. Corbi is prepared to perform all duties of local counsel including appearing at local hearings, as well as other duties required by the LBR or other procedures of the Court.

5. The undersigned counsel for Mr. Delgado requests that the Court grant the motion for leave and exempt Mr. Delgado and his counsel from the requirement of obtaining local counsel under LBR 2090-4.

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)
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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.

THE LAW OFFICES OF RICHARD J. CORBI PLLC

By: /s/ Richard J. Corbi

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Debtors.	:	(Jointly Administered)
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**ORDER GRANTING MOTION
TO WAIVE LOCAL COUNSEL REQUIREMENT UNDER L.B.R. 2090-4**

Before the Court is the Motion to Waive Local Counsel Requirement Under Local Rule 2090-4 [Doc. No.] (the “**Motion**”) filed by counsel to Mr. Mauricio Delgado. The Court having reviewed the Motion and finding that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and that just cause exists for the relief granted herein; and the Court being otherwise fully advised the premises;

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.

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Motion is **GRANTED** pursuant to the terms of this Order.
2. Mr. Mauricio Delgado and Counsel at The Law Offices of Richard J. Corbi PLLC (“**Corbi Law**”) may proceed without local counsel as defined by Rule 2090-4 of Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas and Corbi Law may act as local counsel in this case.

##END OF ORDER##

Prepared By:

THE LAW OFFICES OF RICHARD J. CORBI PLLC

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