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COUNSEL FOR AUTOMOTIVE RENTALS, INC. T/A HOLMAN

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

In re:

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

Debtors.

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

**MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Automotive Rentals, Inc. t/a Holman (“**Holman**”) files this Motion for Leave to Proceed without Local Counsel. In support thereof, Holman would respectfully show the Court as follows:

1. On September 10, 2025, Tricolor Holdings LLC and certain of its affiliates filed petitions under Chapter 7 of the Bankruptcy Code.
2. Local Bankruptcy Rule 2090-4 requires local counsel<sup>2</sup> “in all cases where an attorney appearing in a case does not reside or maintain an office in this district.” *See* L.B.R. 2090-4(a). A party who desires to proceed without local counsel must obtain leave from the Presiding Judge. *Id.* Holman files this motion seeking leave to proceed without local counsel.

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

<sup>2</sup> “Local Counsel” means “a member of the bar of this court who resides or maintains an office in the division in which the case is pending.” *See* L.B.R. 2090-4(a).



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3. The undersigned attorneys' office is more than fifty miles from the courthouse, but they are (1) familiar with this Court's rules and (2) willing and able to appear in person, on short notice as necessary. ARI's counsel, Scott R. Cheatham, is admitted to practice in Texas and in this Court. He has appeared in this Court as counsel on numerous occasions and is familiar with the local rules and practices of this Court and he 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 this Court.

4. Given the nature of this case, Holman respectfully submits that the retention of local counsel is not necessary for the efficient progression of this matter.

**PRAYER**

Automotive Rentals, Inc. t/a Holman respectfully requests the Court grant this Motion for Leave to Proceed without Local Counsel.

Respectfully submitted,

**ADAMS AND REESE LLP**

By: /s/ Scott R. Cheatham

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**COUNSEL FOR AUTOMOTIVE  
RENTALS, INC. t/a HOLMAN**

**CERTIFICATE OF SERVICE**

I certify that on December 16, 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.

/s Scott R. Cheatham  
SCOTT R. CHEATHAM

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

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In re:

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

Debtors.

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**ORDER GRANTING MOTION FOR LEAVE TO  
PROCEED WITHOUT LOCAL COUNSEL**

Before the Court is the Motion For Leave to Proceed Without Local Counsel Under Local Rule 2090-4 [Doc. No. 547] (the “Motion”) filed by counsel to Automotive Rentals, Inc. t/a Holman (“**Holman**”). The Court having reviewed the Motion and finding that it has jurisdiction

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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;

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Motion is **GRANTED** pursuant to the terms of this Order.
2. Holman and Counsel at Adams and Reese LLP (“**Adams and Reese**”) 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 Adams and Reese may act as local counsel in this case.

##END OF ORDER##

Prepared By:

**ADAMS AND REESE LLP**

By: /s/ Scott R. Cheatham

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*t/a HOLMAN*