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*Counsel to TBK Bank, SSB*

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

**In re**

**TRICOLOR HOLDINGS, LLC, *et al.*,**

**Debtors.<sup>1</sup>**

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**Chapter 7**

**Case No. 25-33487 (MVL)**

**(Joint Administration Requested)**

**TBK BANK, SSB’S WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED ON  
 (I) CHAPTER 7 TRUSTEE’S SALE MOTION; (II) CHAPTER 7 TRUSTEE’S  
 RETENTION MOTION; AND (III) CHAPTER 7 TRUSTEE’S MOTION TO EXPEDITE**

TBK Bank, SSB (“**Agent**” or “**TBK Bank**”) files this witness and exhibit list (the  
 “**Witness and Exhibit List**”) for the hearing scheduled on December 18, 2025, at 1:30 p.m. (CDT)

<sup>1</sup> The Debtors and their bankruptcy case numbers are: Tricolor Holdings, LLC (25-33487), TAG Intermediate Holding Company, LLC (25-33495), Tricolor Auto Group, LLC (25-33496), Tricolor Auto Acceptance, LLC (25-33497), Tricolor Insurance Agency, LLC (25-33512), Tricolor Home Loans LLC (25-33511), Tricolor Real Estate Services (25-33514), TAG California Holding Company, LLC (25-33493), Flexi Compras Autos, LLC (25-33490), TAG California Intermediate Holding Company, LLC (25-33494), Tricolor California Auto Group, LLC (25-33502), Tricolor California Auto Acceptance, LLC (25-33501), Risk Analytics LLC (25-33491), Tricolor Tax, LLC (25-33515), Tricolor Financial, LLC (25-33510), Tricolor Auto Receivables LLC (25-33498), TAG Asset Funding, LLC (25-33492), Apoyo Financial, LLC (25-33489).



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(or as such hearing may be continued or rescheduled, the “**Hearing**”) regarding the following matters:

- (i) *Chapter 7 Trustee’s Amended 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. 537] (the “**Sale Motion**”);
- (ii) *Chapter 7 Trustee’s Application for Entry of an Order Authorizing the Employment and Retention of Automotive Rentals, Inc. T/A Holman as Auctioneer, Effective as of December 18, 2025* [Docket No. 538] (the “**Retention Motion**”); and
- (iii) *Chapter 7 Trustee’s Motion for Expedited Consideration of (I) Chapter 7 Trustee’s Amended Emergency Sale Motion [Docket No. 537] and (II) Chapter 7 Trustee’s Application to Employ Automotive Rentals, Inc. T/A Holman as Auctioneer [Docket No. 538] [Docket No. 540]* (the “**Motion to Expedite**”).

Agent reserves the right to supplement or amend this Witness and Exhibit List at any time prior to or during the Hearing.

#### **WITNESSES**

Agent may call any of the following witnesses at the Hearing:

- 1. Any witnesses necessary to authenticate a document;
- 2. Any witnesses called or designated by any other party; and
- 3. Any witnesses necessary to rebut the evidence or testimony of any witness offered or designated by any other party.

**EXHIBITS**

Agent may offer into evidence any one or more of the following exhibits at the Hearing:

| <b>EXHIBIT</b> | <b>DESCRIPTION</b>  | <b>OFFERED</b> | <b>OBJECTION</b> | <b>ADMITTED</b> | <b>DATE</b> | <b>DISPOSITION</b> |
|----------------|---|----------------|------------------|-----------------|-------------|--------------------|
| 1.             | Any motion, pleading, or other document filed in these cases or any related cases               |                |                  |                 |             |                    |
| 2.             | Any exhibit needed to rebut the testimony of witnesses or evidence presented by any other party |                |                  |                 |             |                    |
| 3.             | Any exhibit designated by any other party   |                |                  |                 |             |                    |

*[Remainder of Page Left Intentionally Blank]*

Dated: December 17, 2025

/s/ Bradley R. Foxman

**VINSON & ELKINS LLP**

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**CERTIFICATE OF SERVICE**

I certify that on December 17, 2025 I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Bradley R. Foxman

One of Counsel