

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

IN RE:

TRICOLOR HOLDINGS, LLC, *et al.*,

Debtors.¹

Chapter 7

Case No.: 25-33487 (MVL)

(Jointly Administered)

NOTICE APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that Jeffrey J. Ansley, Brooke H. Blackwell, and Katherine M. Devlin, (collectively, “**Counsel**”) of the law firm Vedder Price, P.C. represent party-in-interest Andy Mata (“**Mr. Mata**”) in the above-entitled and numbered cause. Counsel hereby appears, and as such requests, pursuant to Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Sections 102(1), 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case, be given and served upon them at each of the following addresses, telecopies, emails, and telephone numbers:

¹ 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), and Apoyo Financial, LLC (25-33489).



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-and-

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PLEASE TAKE FURTHER NOTICE that demand is also made that the above-referenced Counsel be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in the above captioned chapter 7 case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim, or suit is intended to waive and shall not constitute a waiver of: (i) Mr. Mata's right to have final orders in non-core matters entered only after *de novo* review by a District Court; (ii) Mr. Mata's right to a jury trial in any proceedings so triable herein, or in any case, controversy, or proceeding related hereto; (iii) Mr. Mata's right to request to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Mr. Mata is or may be entitled to under agreements, documents or instruments, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated December 17, 2025.

Respectfully submitted,

VEDDER | PRICE, P.C.

/s/ Jeff Ansley

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ATTORNEYS FOR ANDY MATA

CERTIFICATE OF SERVICE

I certify that on December 17, 2025, a true and correct copy of the foregoing document was served to all known counsel of record in this cause *via* the Court's CM/ECF system.

/s/ Jeff Ansley

Jeffrey J. Ansley