

MCDERMOTT WILL & SCHULTE LLP

Charles R. Gibbs (TX Bar No. 7846300)
 Marcus A. Helt (TX Bar No. 24052187)
 Grayson Williams (TX Bar No. 24124561)
 2801 North Harwood Street, Suite 2600
 Dallas, Texas 75201
 Tel: 214.295.8000
 Fax: 972.232.3098
 E-mail: crgibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
 One Vanderbilt Avenue
 New York, New York 10017-3852
 Tel: 212.547.5400
 Fax: 212.547.5444
 E-mail: dazman@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

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

)	
In Re:)	Chapter 7
)	
TRICOLOR HOLDINGS, LLC, <i>et al.</i> , ¹)	Case No. 25-33487 (MVL)
)	
Debtors.)	
)	

**CHAPTER 7 TRUSTEE’S MOTION TO SET LANDLORD
 ADMINISTRATIVE EXPENSE CLAIM BAR DATE AND
APPROVE FORM AND MANNER OF NOTICE**

21-DAY NEGATIVE NOTICE – LBR 9007-1:

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS, 75242 BEFORE CLOSE OF BUSINESS ON APRIL 20, 2026, WHICH IS AT LEAST 24 DAYS FROM THE DATE OF SERVICE HEREOF.

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



Anne Elizabeth Burns, the duly appointed Chapter 7 trustee (the “Trustee”) of the estates of the above-captioned debtors (the “Debtors”), files this *Motion to Set Landlord Administrative Expense Claim Bar Date and Approve Form and Manner of Notice* (the “Motion”), and respectfully states as follows:

1. On September 10, 2025 (the “Petition Date”), the Debtors each commenced a case by filing a petition for relief under chapter 7 of the Bankruptcy Code (collectively, the “Chapter 7 Cases”). The Chapter 7 Cases are being jointly administered for procedural purposes only.

2. On the Petition Date, the Office of the United States Trustee for Region 6 (the “U.S. Trustee”) appointed Anne Elizabeth Burns as the Trustee over the Chapter 7 Cases.

3. On October 27, 2025, the Trustee filed the *Chapter 7 Trustee’s First Omnibus Motion for Entry of an Order (I) Authorizing the Trustee to (A) Reject Certain Unexpired Real Property Leases and (B) Abandon Certain Personal Property, and (II) Granting Related Relief* [Docket No. 269] (the “Rejection Motion”).

4. The Debtors were party to over seventy-five (75) unexpired real property leases, the substantial majority of which were rejected pursuant to the Rejection Motion. Various stipulations were filed to address the Debtors’ remaining unexpired real property leases.

5. In order to administer the Debtors’ estates, the Trustee files this Motion to (i) require landlords who wish to assert an administrative claim against the bankruptcy estates to file claims with the Court, and (ii) establish a bar date with respect thereto.

6. Setting a bar date at this time will enable the Trustee to determine the amount of landlord administrative claims and the effect such claims will have on the continued administration of the Debtors’ estates.

7. The Trustee requests that a deadline be established such that the landlords alleging administrative expense claims under section 503(b) of the Bankruptcy Code would be required to file such administrative expense claims no later than 30 days from entry of an order approving this Motion (the “Landlord Administrative Expense Claim Bar Date”).

8. The Trustee also requests that any landlord administrative expense claim that is not filed with the Court on or before the Landlord Administrative Expense Claim Bar Date should be forever waived and barred.

9. The Trustee further requests that the Court approve the form of notice (“Notice”) attached hereto as **Exhibit A**. The Trustee will serve the Notice promptly after entry of an order, establishing the Landlord Administrative Expense Claim Bar Date, on all potential landlord administrative expense claimants in the Chapter 7 Cases. A proposed order is attached hereto as **Exhibit B**.

WHEREFORE, the Trustee respectfully requests that this Court enter an order substantially in the form attached hereto as **Exhibit B** (a) establishing the Landlord Administrative Expense Claim Bar Date no later than 30 days from entry of an order on this Motion, (b) approving the form of Notice attached hereto as **Exhibit A** for the Landlord Administrative Expense Claim Bar Date, and (c) granting the Trustee such other and further relief to which she may be justly entitled.

[Remainder of page intentionally left blank]

Dated: March 26, 2026
Dallas, Texas

Respectfully submitted,

/s/ Charles R. Gibbs

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
MCDERMOTT WILL & SCHULTE LLP
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Tel: 214.295.8000
Fax: 972.232.3098
E-mail: cr gibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

-and-

Darren Azman (admitted *pro hac vice*)
MCDERMOTT WILL & SCHULTE LLP
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: 212.547.5400
Fax: 212.547.5444
E-mail: dazman@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that on March 26, 2026, a true and correct copy of the foregoing Motion was served on all parties authorized to receive electronic notice in this case via the CM/ECF system for the United States Bankruptcy Court for the Northern District of Texas. The Debtors' claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Motion.

/s/ Charles R. Gibbs
Charles R. Gibbs

LOCAL RULE 9013-1(a) CERTIFICATION

Given the fact that over seventy parties are affected by the Motion, the Trustee believes that conferring with the attorneys for affected parties is neither possible nor practicable.

/s/ Charles R. Gibbs
Charles R. Gibbs

EXHIBIT A

Notice of Chapter 7 Landlord Administrative Expense Claim Bar Date

MCDERMOTT WILL & SCHULTE LLP

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Tel: 214.295.8000
Fax: 972.232.3098
E-mail: crgibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: 212.547.5400
Fax: 212.547.5444
E-mail: dazman@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

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

_____)	
In Re:)	Chapter 7
)	
TRICOLOR HOLDINGS, LLC, <i>et al.</i> , ¹)	Case No. 25-33487 (MVL)
)	
Debtors.)	
_____)	

**NOTICE OF CHAPTER 7 LANDLORD
ADMINISTRATIVE EXPENSE CLAIM BAR DATE**

PLEASE TAKE NOTICE that on April [-], 2026, the Court entered an Order (the “Order”) setting a landlord administrative expense claim bar date 30 days from entry of the Order.

The Order provides that landlords with administrative expense claims under 11 U.S.C. § 503 (each a “Landlord Administrative Expense Claim”), must file their request for allowance of a Landlord Administrative Expense Claim not later than **May [-], 2026** (the “Landlord Administrative Expense Claim Bar Date”).

Any party who fails to file a request for a Landlord Administrative Expense Claim with the Bankruptcy Court on or before the Landlord Administrative Expense Claim Bar Date shall be

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

barred from ever (a) asserting any Landlord Administrative Expense Claim against the Debtors' bankruptcy estates and (b) receiving distributions from the bankruptcy estates on account of any Landlord Administrative Expense Claim.

/s/ Draft

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
MCDERMOTT WILL & SCHULTE LLP
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Tel: 214.295.8000
Fax: 972.232.3098
E-mail: ergibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

-and-

Darren Azman (admitted *pro hac vice*)
MCDERMOTT WILL & SCHULTE LLP
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: 212.547.5400
Fax: 212.547.5444
E-mail: dazman@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

EXHIBIT B

Proposed Order

determined that adequate notice of the Motion was provided, and no responses or objections were filed, is of the opinion that the Motion should be granted. It is therefore;

ORDERED that the Motion is **GRANTED**; it is further,

ORDERED that any party intending to assert a request under 11 U.S.C. § 503(b) for payment of any administrative expense relating to post-petition rent or expenses arising from a lease of real property in this case shall file such request with the Court no later than 30 days from the entry of this order or any such request will be deemed forever waived and barred; it is further

ORDERED that the Trustee shall serve a copy of the Notice attached as Exhibit A to the Motion on all potential landlord administrative expense claimants within (5) five days of the entry of this order.

END OF ORDER

Submitted by,

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
MCDERMOTT WILL & SCHULTE LLP
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Tel: 214.295.8000
Fax: 972.232.3098
E-mail: crgibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

-and-

Darren Azman (admitted *pro hac vice*)
MCDERMOTT WILL & SCHULTE LLP
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: 212.547.5400
Fax: 212.547.5444
E-mail: dazman@mcdermottlaw.com

Counsel to the Chapter 7 Trustee