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*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> , <sup>1</sup>	)		Case No. 25-33487 (MVL)
	)		
Debtors.	)		
	)		

**WITNESS AND EXHIBIT LIST OF THE CHAPTER 7 TRUSTEE  
 FOR HEARING SCHEDULED ON APRIL 1, 2026**

Anne Elizabeth Burns, solely in her capacity as the duly appointed Chapter 7 bankruptcy trustee (the “Trustee”) for Tricolor Holdings, LLC and its various debtor affiliates, hereby files this *Witness and Exhibit List of the Chapter 7 Trustee for Hearing Scheduled on April 1, 2026* (the “Witness and Exhibit List”) in connection with the matters scheduled for hearing on April 1, 2026, at 9:30 a.m. (prevailing Central Time) (the “Hearing”):

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



**WITNESSES**

1. Any witness listed, offered, or called by the U.S. Trustee, Vervent, Inc. or any other party or party in interest;
2. Any witness necessary to authenticate a document; and
3. Any witness required for rebuttal or impeachment.

**EXHIBITS**

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Trustee’s Live Lift Stay Motion and Demand Letter Chart				
2.	Demand Letter to Trustee from Jose Alberto Alvarez Aguirre dated February 27, 2026				
3.	Demand Letter to Trustee from German Augusto Hoyos Baquero dated February 27, 2026				
4.	Demand Letter to Trustee from Sergio Lobato Carrillo dated March 2, 2026				
5.	Demand Letter to Trustee from Yosvanys Garcia Diaz dated March 3, 2026				
6.	Demand Letter to Trustee from Jose Alberto Ferrer Suarez dated March 2, 2026				
7.	Demand Letter to Trustee from Juan Pable Frijoli Campos dated March 3, 2026				
8.	Demand Letter to Trustee from Jose Eduardo Alas Linares dated February 27, 2026				
9.	Demand Letter to Trustee from Juan Aciel Calafell Martinez dated March 4, 2026				
10.	Demand Letter to Trustee from Evaristo Valle Mendoza dated March 2, 2026				

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
11.	Demand Letter to Trustee from Salomon Vaquera Oviedo dated March 2, 2026				
12.	Demand Letter to Trustee from Judith Morffi Perez dated March 2, 2026				
13.	Demand Letter to Trustee from Hector Javier Fuentes Polanco dated March 2, 2026				
14.	Demand Letter to Trustee from Laura Imelda Ramos Galvan dated March 4, 2026				
15.	Demand Letter to Trustee from Itan Ortiz Sanchez dated March 4, 2026				
17.	Any paper or pleading on file in these cases				
18.	Any exhibits listed, designated, or offered by the U.S. Trustee, Vervent, Inc. or any other party or party in interest				
19.	Any exhibits necessary for rebuttal				

**RESERVATION OF RIGHTS**

The Trustee reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the Orders of this Court. The Trustee reserves the right to offer into evidence any other exhibit designated by any other party in connection with the hearing on these matters. The Trustee also reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

Dated: Dallas, Texas  
March 29, 2026

**MCDERMOTT WILL & SCHULTE LLP**

/s/ Charles R. Gibbs

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-and-

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*Counsel to the Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I do hereby certify that on March 29, 2026, a true and correct copy of the foregoing document was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this case.

/s/ Charles R. Gibbs  
Charles R. Gibbs