

VINSON & ELKINS LLP

Bradley R. Foxman (TX 24065243)
Matthew W. Moran (TX 24002642)
Sara E. Zoglman (TX 24121600)
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201
Tel: 214-220-7700
Fax: 214-220-7716
Email: bfoxman@velaw.com
mmoran@velaw.com
szoglman@velaw.com

VINSON & ELKINS LLP

Paul E. Heath (TX 09355050)
845 Texas Avenue, Suite 4700
Houston, Texas 77002
Tel: 713-758-2222
Fax: 713-758-2346
Email: pheath@velaw.com

Counsel to TBK Bank, SSB

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

In re	§	
	§	Chapter 7
	§	
TRICOLOR HOLDINGS, LLC, et al.,	§	Case No. 25-33487 (MVL)
	§	
Debtors.¹	§	Jointly Administered
	§	

**TBK BANK, SSB’S MOTION FOR EXPEDITED CONSIDERATION OF
TBK BANK’S MOTION TO COMPEL TRUSTEE AND VERACITY FORENSICS LLC
TO RESPOND TO DISCOVERY AND PRODUCE DOCUMENTS [DOCKET NO. 973]**

PLEASE TAKE NOTICE that TBK Bank, SSB (“**TBK**”) files this motion (this “**Motion for Expedited Consideration**”), seeking entry of an order, substantially in the form attached hereto as Exhibit A (the “**Proposed Order**”), granting the relief described below. In support of this Motion for Expedited Consideration, TBK respectfully states as follows:

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



RELIEF REQUESTED

1. By this Motion for Expedited Consideration, TBK seeks entry of the Proposed Order shortening notice and scheduling an expedited setting on *TBK Bank's Motion To Compel Trustee And Veracity Forensics LLC To Respond To Discovery And Produce Documents* [Docket No. 973] (the "*Motion to Compel*")² to be held on **April 1, 2026 at 9:30 a.m. (Central Time)**. **The Trustee (as defined below) has consented to TBK's request for expedited consideration.**

2. The Motion to Compel seeks an order compelling Anne Elizabeth Burns, in her capacity as the chapter 7 trustee (the "**Trustee**") appointed over each of the estates of the above-captioned debtors, and Veracity Forensics LLC to produce certain documents responsive to TBK's Requests for Production issued in connection with the Trustee's *Amended Motion for Entry of an Order (I) Authorizing the Trustee to Surcharge the Prepetition Lenders' Collateral, (II) Limiting the Prepetition Lenders' Liens on Proceeds of the Collateral, (III) Ordering the Prepetition Lenders to Pay the Expenses, and (IV) Granting Related Relief* [Docket No. 951], and overruling certain of their objections to the same.

3. TBK respectfully submits that emergency relief is necessary to allow discovery to proceed on the schedule agreed upon by the parties which requires all document production to be completed by April 15, 2026 in advance of a deposition deadline of May 1, 2026 and an objection deadline of May 15, 2026. Absent the relief requested in this Motion for Expedited Consideration, a ruling on the Motion to Compel would not take place prior to the deadline to complete document production. Accordingly, TBK respectfully submits that the relief sought herein is urgent and that the circumstances require expedited consideration of the Motion to Compel.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to them in the Motion to Compel.

4. Notice of the proposed expedited hearing will be provided to all parties of record via the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

5. TBK respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as Exhibit A, (i) granting this Motion for Expedited Consideration, (ii) setting a hearing on the Motion to Compel for **April 1, 2026 at 9:30 a.m. (Central Time)**, and (iii) granting such other relief as the Court deems appropriate under the circumstances.

Dated: March 30, 2026

/s/ Bradley R. Foxman
VINSON & ELKINS LLP
Bradley R. Foxman (TX 24065243)
Matthew W. Moran (TX 24002642)
Sara E. Zoglman (TX 24121600)
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201
Tel: 214-220-7700
Fax: 214-220-7716
Email: bfoxman@velaw.com
mmoran@velaw.com
szoglman@velaw.com

-and-

Paul E. Heath (TX 09355050)
845 Texas Avenue, Suite 4700
Houston, Texas 77002
Tel: 713-758-2222
Fax: 713-758-2346
Email: pheath@velaw.com

Counsel to TBK Bank, SSB

CERTIFICATE OF SERVICE

I certify that, on March 30, 2026, I caused a copy of the foregoing document to be served on counsel of record for the Trustee via email.

/s/ Bradley R. Foxman
Bradley R. Foxman

CERTIFICATE OF CONFERENCE

On March 27, 2026, I notified counsel of record for the Trustee, via email, of TBK’s plans to file this Motion for Expedited Consideration and requested she inform me of the Trustee’s position regarding the relief requested within—including expediting the hearing for TBK’s Motion to Compel to April 1, 2026. Later that day, the Trustee’s counsel responded and informed me that the Trustee consents to the relief requested.

/s/ Matthew W. Moran
Matthew W. Moran

Exhibit A
Proposed Order

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

In re	§	
	§	Chapter 7
TRICOLOR HOLDINGS, LLC, et al.,	§	
	§	Case No. 25-33487 (MVL)
Debtors.¹	§	
	§	Jointly Administered
	§	

**ORDER EXPEDITING CONSIDERATION OF TBK BANK’S
MOTION TO COMPEL TRUSTEE AND VERACITY FORENSICS LLC TO
RESPOND TO DISCOVERY AND PRODUCE DOCUMENTS [DOCKET NO. 973]**

Upon the motion (the “**Motion for Expedited Consideration**”) of TBK Bank, SSB (“**TBK**”) for entry of an order shortening notice and scheduling an expedited setting on *TBK*

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

Bank's Motion To Compel Trustee And Veracity Forensics LLC To Respond To Discovery And Produce Documents [Docket No. 973] (the "**Motion to Compel**");

IT IS HEREBY ORDERED THAT:

The Motion for Expedited Consideration is **GRANTED** as set forth herein.

The Motion to Compel will be heard on **April 1, 2026, at 9:30 a.m. (prevailing Central Time)**.

End of Order