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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 9, 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 9, 2026* (the

<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.



“Witness and Exhibit List”) in connection with the matters scheduled for hearing on April 9, 2026, at 1:30 p.m. (prevailing Central Time) (the “Hearing”):

**WITNESSES**

1. Any witness listed, offered, or called by Clay Cooley Motor Company 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.	Any paper or pleading on file in these cases				
2.	Any exhibits listed, designated, or offered by Clay Cooley Motor Company or any other party or party in interest				
3.	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  
April 6, 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 April 6, 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