

**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  
 Telephone: (214) 295-8000  
 E-mail: [crgibbs@mcdermottlaw.com](mailto:crgibbs@mcdermottlaw.com)  
[mhelt@mcdermottlaw.com](mailto:mhelt@mcdermottlaw.com)  
[gwilliams@mcdermottlaw.com](mailto:gwilliams@mcdermottlaw.com)

**MCDERMOTT WILL & SCHULTE LLP**

Darren Azman (admitted *pro hac vice*)  
 Jared M. Gerber (admitted *pro hac vice*)  
 One Vanderbilt Avenue  
 New York, New York 10017-3852  
 Telephone: (212) 547-5400  
 E-mail: [dazman@mcdermottlaw.com](mailto:dazman@mcdermottlaw.com)  
[jmgerber@mcdermottlaw.com](mailto:jmgerber@mcdermottlaw.com)

**MCDERMOTT WILL & SCHULTE LLP**

Julia M. Beskin (admitted *pro hac vice*)  
 919 Third Avenue  
 New York, New York 10022  
 Telephone: (212) 756-2000  
 Email: [jbeskin@mcdermottlaw.com](mailto:jbeskin@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> ,	)	Case No. 25-33487 (MVL)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

**NOTICE OF ABATEMENT**

**PLEASE TAKE NOTICE** that, in order to avoid the expense of unnecessary litigation pending the resolution of ownership, lien, and/or priority disputes as to Vehicles and Net Sale Proceeds (each as defined in the *Order Granting Chapter 7 Trustee’s Amended Emergency Motion to (I) Sell Estate Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II)*

<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.



*Establish Sale Procedures, and (III) Granting Related Relief, [Docket No. 593]), the Chapter 7 Trustee's 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. 916] (the "Surcharge Motion") is hereby abated.*

**PLEASE TAKE FURTHER NOTICE** that the Trustee reserves her right to (i) request that the Court re-set the hearings on the Surcharge Motion and (ii) re-set the deadlines for objecting to the Surcharge Motion by filing a notice on the docket with any such re-set hearing or new deadlines.

**PLEASE TAKE FURTHER NOTICE** that the Trustee will notice a status conference with the Court to discuss the Surcharge Motion and case disposition the week of July 3, 2026.

Dated: New York, New York  
April 6, 2026

**MCDERMOTT WILL & SCHULTE LLP**

/s/ Julia M. Beskin

Julia M. Beskin (admitted *pro hac vice*)  
**MCDERMOTT WILL & SCHULTE LLP**  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 756-2000  
E-mail: jbeskin@mcdermottlaw.com

Darren Azman (admitted *pro hac vice*)  
Jared M. Gerber (admitted *pro hac vice*)  
**MCDERMOTT WILL & SCHULTE LLP**  
One Vanderbilt Avenue  
New York, New York 10017-3852  
Telephone: (212) 547-5400  
E-mail: dazman@mcdermottlaw.com  
jmgerber@mcdermottlaw.com

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  
Telephone: (214) 295-8000  
E-mail: crgibbs@mcdermottlaw.com  
mhelt@mcdermottlaw.com  
gwilliams@mcdermottlaw.com

*Counsel to Plaintiff, the Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I do hereby certify that on April 6, 2026, a true and correct copy of the foregoing notice was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on counsel for all parties authorized to receive electronic notice in this case.

/s/ Julia M. Beskin  
Julia M. Beskin