

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

In re:

TRICOLOR HOLDINGS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 25-33487 (MVL)

(Jointly Administered)

**STIPULATION AND AGREED ORDER REGARDING THE TIME TO RESPOND TO
CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF GRANT THORNTON
LLP AND CERTAIN AFFILIATES AND (II) DIRECTING THE PRODUCTION OF
DOCUMENTS**

Anne Elizabeth Burns, as Chapter 7 Trustee (the "Trustee") for Tricolor Holdings, LLC, *et al.* (the "Debtors") and Grant Thornton LLP ("Grant Thornton," collectively with the Trustee, the

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



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“Parties,” and each individually a “Party”) hereby enter into this Stipulation and Agreed Order and agree as follows:

WHEREAS, on March 26, 2026, the Trustee filed her *Chapter 7 Trustee’s Motion For Entry Of An Order Pursuant To Bankruptcy Rule 2004 (i) Directing Examination Of Grant Thornton LLP And Certain Affiliates And (ii) Directing The Production Of Documents* [ECF. No. 968] (the “Motion”);

WHEREAS, Grant Thornton’s response to the Motion, if any, is currently returnable on or before April 16, 2026;

WHEREAS, the Parties have yet to confer about the potential 2004 requests and the Motion and desire the opportunity to do so;

WHEREAS, the Parties have agreed to move the deadline in which to file a response to the Motion, if any, to Monday, May 18, 2026 to provide time to confer;

WHEREAS, Grant Thornton does not waive and instead preserves all of its rights and potential objections as to the Motion;

IT IS THEREFORE STIPULATED AND AGREED BY THE PARTIES AND ORDERED BY THE COURT THAT:

1. The return date on Grant Thornton’s response to the Motion, if any, is extended until May 18, 2026.

###End of Order###

AGREED TO FORM AND SUBSTANCE:

Respectfully submitted,

HOLLAND & HART LLP

/s/ Brian Neil Hoffman

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