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

IN RE: § Case No. 25-33487 (MVL)
§
TRICOLOR HOLDINGS, LLC, et al.,¹ § Chapter 7
§
Debtor(s). § Hearing Date: April 9, 2026

**WITNESS AND EXHIBIT LIST OF CLAY COOLEY MOTOR COMPANY FOR
HEARING SCHEDULES ON APRIL 9, 2026**

Clay Cooley Motor Company (“Clay Cooley”), hereby files this *Witness and Exhibit List for Clay Cooley Motor Company for Hearing Scheduled on April 9, 2026* (the “Witness and Exhibit List”) in connection with the matters scheduled for hearing on April 9, 2026, at 1:30pm (prevailing Central Time) (the “Hearing”):

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



WITNESSES

1. Holli Smith, Controller, Clay Cooley Motor Company;
2. Any witness listed, offered, or called by Clay Cooley Motor Company or any other party or party in interest;
3. Any other witness necessary to authenticate a document; and,
4. Any witness required for rebuttal or impeachment.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Invoices for parts purchased from Clay Cooley Motor Company				
2.	Dealer Documents for Pre-Petition Cars				
3.	News Article Evidencing Date of Tricolor’s Date of Closing				
4.	Any paper or pleading on file in these cases				
5.	Any exhibits listed, designated, or offered by the Chapter 7 Trustee or any other party or party in interest				
6.	Any exhibits necessary for rebuttal				

RESERVATION OF RIGHTS

Clay Cooley 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. Clay Cooley reserves the right to offer into evidence any other exhibit designated by any other party in connection with the Hearing on these matters. Clay Cooley also reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

Respectfully submitted,

By: /s/ Sidney H. Scheinberg
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above and foregoing Notice of Hearing has been served on each of the following parties of interest on April 7, 2026, as shown either by first class postage or notified electronically:

Debtor's Attorney

Thomas Robert Califano
Sidley Austin LLP
787 Seventh Avenue
New York, NY 10019

Debtor

Tricolor Holdings, LLC
6021 Connection Drive
4th Floor
Irving, TX 75039

Trustee

Anne Elizabeth Burns
900 Jackson Street, Suite 570
Dallas, TX 75202

U.S. Trustee

1100 Commerce Street
Room 976
Dallas, TX 75202
214-767-8967

Parties in Interest

/s/ Sidney H. Scheinberg
SIDNEY H. SCHEINBERG