Docket #1413 Date Filed: 08/27/2026

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

| | |
|---|---|
| In re: | Chapter 7 |
| TRICOLOR HOLDINGS, LLC, *et al.*,[1] | Case No. 25-33487 (MVL) |
| Debtors. | (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 ARES AGENT SERVICES, L.P. AND ARES MANAGEMENT LLC 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 Ares Agent Services, L.P. and Ares Management LLC (together, "Ares," and collectively with the Trustee, the "Parties"), hereby enter into this Stipulation and Agreed Order and agree as follows:

[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.

25334872608270000000000002

WHEREAS, on July 8, 2026, the Trustee filed her *Chapter 7 Trustee's Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 (I) Directing Examination of Ares Agent Services, L.P. and Ares Management LLC and (II) Directing the Production of Documents* [ECF No. 1297] (the "Motion");

WHEREAS, Ares's response to the Motion was originally returnable on or before July 29, 2026;

WHEREAS, the Parties previously extended Ares's response time to the Motion to on or before August 29, 2026;

WHEREAS, Ares has agreed in principle to make voluntary productions to the Trustee;

WHEREAS, Ares made a production of documents to the Trustee on August 18, 2026, which the Trustee is currently reviewing;

WHEREAS, the Parties are continuing to confer regarding voluntary productions by Ares that would obviate the need for the Court to rule on the Trustee's Motion;

WHEREAS, to provide time for the Parties to complete their conferral process and for Ares to complete its productions, to the extent any additional productions are made, the Parties have agreed to move the deadline for Ares to file a response to the Motion, if any, to September 29, 2026;

WHEREAS, Ares does not waive and instead preserves all 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 deadline for Ares's response to the Motion, if any, is extended until September 29, 2026.

###End of Order###

**AGREED TO FORM AND SUBSTANCE:**

/s/ *Eric D. Madden*
Eric D. Madden (TX 24013079)
Richard H. Howell (TX 24151882)
**REID COLLINS & TSAI LLP**
1445 Ross Avenue, Suite 2900
Dallas, Texas 75202
Telephone: (214) 420-8900
E-mail: emadden@reidcollins.com
rhowell@reidcollins.com

William T. Reid, IV (TX 00788817)
Joshua J. Bruckerhoff (TX 24059504)
Aaron A. Brown (TX 24130382)
Seth W. Roye (TX 24144971)
**REID COLLINS & TSAI LLP**
1301 S. Capital of Texas Hwy, Suite C-300
Austin, Texas 78746
Telephone: (512) 647-6100
E-mail: wreid@reidcollins.com
jbruckerhoff@reidcollins.com
abrown@reidcollins.com
sroye@reidcollins.com

*Special Litigation Counsel*
*to the Chapter 7 Trustee*

/s/ *Peter A. Siddiqui*
Peter A. Siddiqui (*pro hac vice forthcoming*)
**KATTEN MUCHIN ROSENMAN LLP**
525 W. Monroe Street
Chicago, IL 60661
E-mail: peter.siddiqui@katten.com

*Counsel for Ares Agent Services, L.P. and*
*Ares Management LLC*