Docket #1418 Date Filed: 08/31/2026

CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed August 27, 2026

United States Bankruptcy Judge

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 WILMINGTON TRUST, N.A., WILMINGTON TRUST COMPANY, 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 Wilmington Trust, N.A. and Wilmington Trust Company (together,

[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.

25334872608310000000000001

"Wilmington," and collectively with the Trustee, the "Parties"), hereby enter into this Stipulation and Agreed Order and agree as follows:

WHEREAS, on July 1, 2026, the Trustee filed her *Chapter 7 Trustee's Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 (I) Directing Examination of Wilmington Trust, N.A., Wilmington Trust Company, and Certain Affiliates and (II) Directing the Production of Documents* [ECF No. 1287] (the "Motion");

WHEREAS, Wilmington's response to the Motion was originally returnable on or before July 22, 2026;

WHEREAS, on July 22, 2026, the Parties agreed to extend the deadline for Wilmington to file a response to the Motion, if any, to August 22, 2026 [ECF No. 1334];

WHEREAS, Wilmington has begun making voluntary productions to the Trustee;

WHEREAS, the Parties are continuing to confer regarding voluntary productions by Wilmington 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, the Parties have agreed to move the deadline for Wilmington to file a response to the Motion, if any, to September 22, 2026;

WHEREAS, Wilmington 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 deadline for Wilmington's response to the Motion, if any, is extended until September 22, 2026.

###End of Order###

AGREED TO FORM AND SUBSTANCE:

/s/ *William T. Reid, IV*
Eric D. Madden (TX 24013079)
Richard H. Howell (N.D. Tex. admission forthcoming)
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 (N.D. Tex. admission forthcoming)
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/ *Bradley M. Smyer*
Bradley M. Smyer (TX 24068237)
ALSTON & BIRD LLP
Dallas Arts Tower
2200 Ross Avenue, Suite 2300
Dallas, TX 75201
Telephone: (214) 922-3400
Facsimile: (214) 922-3899
E-mail: brad.smyer@alston.com

Gerard S. Catalanello (admitted *pro hac vice*)
Stephen M. Blank (admitted *pro hac vice*)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Facsimile: (212) 210-9444
E-mail: gerard.catalanello@alston.com
stephen.blank@alston.com

Counsel for Wilmington Trust, N.A. and Wilmington Trust Company