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Special Litigation 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, *et al*.,[1]	)	Case No. 25-33487 (MVL)
Debtors.	)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES, PLEADINGS AND ORDERS

PLEASE TAKE NOTICE that Seth W. Roye of the law firm of Reid Collins & Tsai LLP hereby appears in the above-captioned case on behalf of Anne Elizabeth Burns, Chapter 7 Trustee (the "Trustee") for the above-referenced Chapter 7 bankruptcy case ("Tricolor"), pursuant to Sections 102(1), 342 and 1109(b) of Title 11, United States Code (the "Bankruptcy Code") and

[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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Rules 2002, 9007, 9008, 9010(b), 9013 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and hereby requests that copies of all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following address and by email to:

Seth W. Roye
Reid Collins & Tsai LLP
1301 S. Capital of Texas Hwy, Ste. C300
Austin, Texas78746
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PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109 of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code provisions specified above, but also includes without any limitation, any notice, application, motion, petition, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, hand or courier delivery, telephone, telegraph, telecopy, telex, electronically or otherwise filed with regard to these cases and any other proceedings herein which affect or seek to affect, in any way, the debtors or property or proceeds in which the debtors may claim or have an interest. Further, this request includes copies of any disclosure statements to be submitted prior to approval and any and all plans of reorganization or liquidation.

PLEASE TAKE FURTHER NOTICE that this Notice is not intended to be, and shall not constitute, consent by the Trustee of Tricolor to the Bankruptcy Court's subject matter jurisdiction, personal jurisdiction, or core jurisdiction.

PLEASE TAKE FURTHER NOTICE that neither this Notice, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with this case is intended to waive: (i) the right to have final orders in non-core matters entered only after de novo review by a

District Court Judge; (ii) the right to trial by jury in any case, controversy, or proceeding; (iii) the right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; and (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which the Trustee of Tricolor is, or may be entitled, under agreements, in law or in equity, all of which are expressly reserved.

PLEASE TAKE FURTHER NOTICE that request is also made that the undersigned be added to any official service list for notice of all contested matters, adversary proceedings or any other proceedings in these cases.

Dated: Dallas, Texas
August 31, 2026

Respectfully submitted,

/s/ Eric D. Madden

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Special Litigation Counsel
to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2026, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ *Eric D. Madden*
Eric D. Madden