Docket #1431 Date Filed: 09/03/2026

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

In Re	§	
TRICOLOR HOLDINGS, LLC, et al.,	§	
Debtors,	§	**Chapter 7**
	§	**CAUSE NO. 25-33487 (MVL)**
	§	
	§	
,	§	

RETURN OF SERVICE

Came to my hand on **Tuesday, August 18, 2026 at 7:01 PM,**
Executed at: **809 BLACKHORSE TRAIL, JUSTIN, TX 76247**
at **9:02 PM,** on **Friday, August 21, 2026,**
by delivering to the within named:

JANETTE VALDIVIA

a true copy of this

ORDER GRANTING THE CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS and CERTIFICATE OF NO OBJECTION REGARDING ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS with EXHIBIT A and CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS with EXHIBITS A & B

By attaching a copy of said document at the front door of **809 BLACKHORSE TRAIL, JUSTIN, TX 76247 per client request** having first endorsed thereon the date of the delivery.

I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

My name is Amine Jomni, I am at least 18 years old, and my business address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Friday, August 28, 2

25334872609030000000000003

By:_____

Amine Jomni PSC 25994 - Exp 03/31/27
served-sd@proceedlegal.com



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 July 22, 2026

United States Bankruptcy Judge

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

In re:	Chapter 7
TRICOLOR HOLDINGS, LLC, *et al.*,[1]	Case No. 25-33487 (MVL)
Debtors.	

ORDER GRANTING THE CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

Upon the motion (the "Motion")[2] of the Trustee pursuant to Rules 2004 and 9016 of the Bankruptcy Rules for an order authorizing the examination of, and the production of documents

[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.

[2] Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

by Reed Crowe, Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette Valdivia, and Brandi Wells (collectively, the "Examinees"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Trustee, the bankruptcy estates, the creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby:

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is GRANTED as set forth herein.

2. Andrew Mata, Nicholas Pizzola, Janette Valdivia, and Brandi Wells (collectively, the "Non-Responsive Former Officers"), having failed to file an objection or other responsive pleading to the Motion by the deadline set forth in the Motion (the "Objection Deadline") or to have otherwise requested an extension of the Objection Deadline, shall produce the documents and other information set forth in the Requests to the offices of McDermott Will & Schulte LLP, 2801 North Harwood Street, Suite 2600, Dallas, Texas 75201, no later than thirty (30) days after

service of service of this Order or by such other date as may be reasonably agreed upon by the parties.

3. The Trustee is authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.

4. This Court shall retain jurisdiction to resolve any disputes arising under or related to this Order, including any discovery disputes that may arise between or among the parties, and to interpret, implement, and enforce the provisions of this Order.

5. This Order only addresses the Non-Responsive Former Officers as defined in this Order. The Trustee shall seek entry of one or more additional orders with respect to relief as to the remaining Examinees, as appropriate.

6. This Order is without prejudice to the rights of the Trustee to apply for other or further discovery from the Non-Responsive Former Officers, any party in interest, or other entity or person.

END OF ORDER # #

Prepared and presented by:

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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.	)	

CERTIFICATE OF NO OBJECTION REGARDING ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

On June 17, 2026, Anne Elizabeth Burns, the Chapter 7 trustee (the "Trustee")[2] of the estates of the above-captioned debtors (the "Debtors"), filed the *Chapter 7 Trustee's Motion for*

[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.

[2] Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion (defined herein).

Entry of an Order Pursuant to Bankruptcy Rule 2004 (I) Directing Examination of Certain Former Officers and (II) Directing the Production of Documents [Docket No. 1264] (the "Motion"). The Trustee hereby certifies that the following are true and correct to the best of her knowledge:

1. Service of the Motion was timely made on June 17, 2026, on (i) all parties entitled to service by ECF in this case, and (ii) the Tricolor Former Officers by the means indicated in the Certificate of Service appended to the Motion. Specifically, Nicholas Pizzola, Janette Valdivia, and Brandi Wells were served via First Class U.S. Mail and e-mail. Andrew Mata was served via ECF and via e-mail upon his attorneys at Vedder | Price, P.C.

2. Objections were due to be filed with the Court no later than July 13, 2026 (the "Objection Deadline").

3. No objections to or requests for hearing on the Motion were received from Mr. Mata, Mr. Pizzola, Ms. Valdivia, or Ms. Wells by the undersigned nor filed with the Court and docketed in the case by the Objection Deadline.

4. The Trustee's proposed Order with respect to Mr. Mata, Mr. Pizzola, Ms. Valdivia, and Ms. Wells only is attached hereto as Exhibit A.

Dated: Dallas, Texas
July 22, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ Julia M. Beskin
Charles R. Gibbs (TX Bar No. 7846300)
Grayson Williams (TX Bar No. 24124561)
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-and-

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E-mail: jbeskin@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that on July 22, 2026, a true and correct copy of the foregoing document was served on all parties authorized to receive electronic notice in this case via the CM/ECF system for the United States Bankruptcy Court for the Northern District of Texas and by FedEx and e-mail on Mr. Mata, Mr. Pizzola, Ms. Valdivia, and Ms. Wells at the addresses set forth below.

/s/ Julia M. Beskin
Julia M. Beskin

Nicholas Pizzola
5535 Willow Lane
Dallas, TX 75230
npizzola@gmail.com

Janette Valdivia
809 Blackhorse Trl.
Justin, TX 76247-1966
j.cadena2912@gmail.com
janettevaldivia@yahoo.com

Andrew Mata
c/o Brooke Blackwell and Katherine Devlin
Vedder | Price, P.C.
300 Crescent Court, Suite 400
Dallas, Texas 75201
bblackwell@vedder.com
kdevlin@vedder.com

Brandi Wells
1308 Palm Canyon Dr.
Dallas, TX 75204-5516
brandi_wells@live.com

Exhibit A

Proposed Order

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

In re:	)	Chapter 7
TRICOLOR HOLDINGS, LLC, *et al.*,[1]	)	Case No. 25-33487 (MVL)
Debtors.	)	

ORDER GRANTING THE CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

Upon the motion (the "Motion")[2] of the Trustee pursuant to Rules 2004 and 9016 of the Bankruptcy Rules for an order authorizing the examination of, and the production of documents

[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.

[2] Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

by Reed Crowe, Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette Valdivia, and Brandi Wells (collectively, the "Examinees"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Trustee, the bankruptcy estates, the creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby:

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is GRANTED as set forth herein.

2. Andrew Mata, Nicholas Pizzola, Janette Valdivia, and Brandi Wells (collectively, the "Non-Responsive Former Officers"), having failed to file an objection or other responsive pleading to the Motion by the deadline set forth in the Motion (the "Objection Deadline") or to have otherwise requested an extension of the Objection Deadline, shall produce the documents and other information set forth in the Requests to the offices of McDermott Will & Schulte LLP, 2801 North Harwood Street, Suite 2600, Dallas, Texas 75201, no later than thirty (30) days after

service of service of this Order or by such other date as may be reasonably agreed upon by the parties.

3. The Trustee is authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.

4. This Court shall retain jurisdiction to resolve any disputes arising under or related to this Order, including any discovery disputes that may arise between or among the parties, and to interpret, implement, and enforce the provisions of this Order.

5. This Order only addresses the Non-Responsive Former Officers as defined in this Order. The Trustee shall seek entry of one or more additional orders with respect to relief as to the remaining Examinees, as appropriate.

6. This Order is without prejudice to the rights of the Trustee to apply for other or further discovery from the Non-Responsive Former Officers, any party in interest, or other entity or person.

END OF ORDER # #

Prepared and presented by:

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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.	)	

CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

[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.

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT LOCATED IN THE EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242, BEFORE CLOSE OF BUSINESS ON JULY 13, 2026, WHICH IS AT LEAST 24 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Anne Elizabeth Burns, Chapter 7 Trustee for the above-referenced Chapter 7 bankruptcy case ("Trustee"), hereby submits this motion (the "Motion") pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Section 105(a) of Title 11 of the Bankruptcy Code (the "Bankruptcy Code"), and Local Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Texas (the "Local Rules"), for entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), authorizing the Trustee to issue discovery without the need for further relief from this Court in the form of the production of documents responsive to the document requests set forth on Exhibit B attached hereto (the "Requests") from Reed Crowe, Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette Valdivia, and Brandi Wells (collectively, the "Tricolor Former Officers"). In support of this Motion, the Trustee respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated

August 3, 1984, entered by the United States District Court for the Northern District of Texas. This matter is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Section 105(a) of the Bankruptcy Code, and Rules 2004 and 9016 of the Bankruptcy Rules.

BACKGROUND

I. The Chapter 7 Case

3. On September 10, 2025 (the "Petition Date"), 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 (collectively, the "Debtor" or "Tricolor"), commenced a case (the "Chapter 7 Case") in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the "Court").

4. On the same day, a Notice of a Chapter 7 Bankruptcy Case was entered, appointing Anne Elizabeth Burns as the Chapter 7 trustee for Tricolor.

5. The Debtor's petition indicated that it has more than 25,000 creditors and between $1 and $10 billion in liabilities.

6. The Tricolor Former Officers were each Officers of the Debtor.

7. Pursuant to the Trustee's duties under the Bankruptcy Code to preserve property of the estate and maximize value for all creditors and stakeholders, the Trustee seeks to obtain certain

documents, communications, and other materials from the Tricolor Former Officers concerning its relationship with the Debtors, their businesses, and other matters set forth herein as stated in the Requests.

BASIS FOR RELIEF REQUESTED

I. Discovery Under Rule 2004

8. Under Fifth Circuit law, a trustee or debtor-in-possession has a duty to investigate the financial affairs of the debtor and prepetition conduct. *See In re Red River Energy, Inc.*, 409 B.R. 163, 181 (Bankr. S.D. Tex. 2009). Bankruptcy Rule 2004 provides the Court with authority to order an examination of any entity or person if such examination relates "to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtors' estate … [and to] any other matter relevant to the case or to the formulation of a plan." Fed. R. Bankr. P. 2004(b).

9. "The purpose of a Rule 2004 examination is to assist a party in interest in determining the nature and extent of the bankruptcy estate, revealing assets, examining transactions and assessing whether wrongdoing has occurred." *In re Recoton Corp.*, 307 B.R. 751, 755 (Bankr. S.D.N.Y. 2004); *In re Ionosphere Clubs, Inc.*, 156 B.R. 414, 432 (S.D.N.Y. 1993). The scope of a Rule 2004 examination is broad. *See, e.g.*, *In re Kipp*, 86 B.R. 490, 491 (Bankr. W.D. Tex. 1988); *In re Enron Corp. Sec. Litig.*, No. H-01-3624, 2004 WL 613091, at *3 (S.D. Tex. Mar. 16, 2004); *In re Edic*, No. 05–41557, 2005 WL 6443541, at *1 (Bankr. N.D. Tex. Oct. 7, 2005) ("Rule 2004 is very broad in scope"). Indeed, any third party that has a relationship with a debtor may be subject to examination. *See e.g.*, *Ionosphere Clubs*, 156 B.R. at 432; *Recoton Corp.*, 307 B.R. at 755; *In re Cousins Barricades & Metal Prods.*, No. Civ.A. 99-2035, 2000 WL 245860 at *3 (E.D. La. Mar. 2, 2000).

10. Rule 2004 provides that, upon the motion of any party in interest, the Court may authorize the examination of any entity, through both document requests and depositions, relating "to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor's estate." Fed. R. Bankr. P. 2004(b).

11. Specifically, Rule 2004 enables a party in interest to:

> obtain information about the debtor's financial condition, matters that may affect the administration of the debtor's estate, right to a discharge, or operation of a business and the desirability of its continuance, sources of, and consideration for, money or property or consummate a plan, and other matters relevant to the case or formulation of a plan.

In re Daisytek, Inc., 323 B.R. 180, 187 (N.D. Tex. 2005).

12. Rule 2004 is an investigatory tool and is extremely broad in scope. *See In re Correra*, 589 B.R. 76, 113 (Bankr. N.D. Tex. 2018); *In re Drexel Burnham Lambert Group, Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (same); *see also In re ECAM Publications, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991).

13. In fact, courts repeatedly have compared Rule 2004 examinations to a "licensed fishing expedition." *In re NE 40 Partners, Ltd. Partnership*, 440 B.R. 124, 129 (Bankr S.D. Tex. 2010); *In re French*, 145 B.R. 991, 992 (Bankr. D.S.D. 1992) ("Bankruptcy Rule 2004 is designed to be a quick 'fishing expedition' into general matters and issues regarding the administration of the bankruptcy case . . ."); *In re GHR Energy Corp.*, 33 B.R. 451, 453 (Bankr. D. Mass.1983) ("The scope of a Rule 2004 examination is broad. Indeed, some have compared it to a 'fishing expedition.'"); *In re Duratech Industries, Inc.*, 241 B.R. 283, 289 (E.D.N.Y. 1999); In re Bennett Funding Grp., Inc., 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996); *see also In re Kipp*, 86 B.R. 490, 491 (Bankr. W.D. Tex. 1988) ("Bankruptcy Rule 2004 authorizes examination of any entity and the scope of such examination is virtually unlimited.").

14. To establish good cause for a Rule 2004 examination, the Trustee need only demonstrate that an examination is reasonably necessary to protect the estates' legitimate interests and if examination is necessary to establish a claim of the Trustee. *See In re McClain Feed Yard, Inc.*, 661 B.R. 136, 142 (Bankr. N.D. Tex. 2024).

II. Good Cause Exists for a Rule 2004 Examination

15. Good cause exists for a Rule 2004 examination and the production of documents because the documents and information requested in the Motion are essential to the Trustee's efforts to maximize the value of the Debtors' estates and investigate potential claims and causes of actions that may exist which may inure to the benefit of the Debtors' creditors and stakeholders.

16. The Trustee believes that important records, documents, communications and other materials which relate to the Debtors' business and dealings with third parties prepetition are in the possession, custody, or control of the Tricolor Former Officers. Specifically, each of the Tricolor Former Officers played a significant role in the Debtors' prepetition business activities, including the Debtors' financial affairs and accounting. Based on such prepetition involvement, the Tricolor Former Officers, and those acting on their behalf, frequently corresponded with and engaged with the Debtors' management. The Trustee believes that the information sought in the Requests is pertinent to the Trustees' investigation of potential claims and causes of action belonging to the estate.

17. Accordingly, by this Motion, the Trustee seeks an order authorizing the Trustee to conduct a Rule 2004 examination of each of the Tricolor Former Officers and directing the Tricolor Former Officers to produce the documents listed in the Requests that will enable the Trustee to maximize the value of the estate and fully investigate potential claims and causes of action belonging thereto.

NOTICE

18. The Trustee will provide notice of the Motion to: (a) the Tricolor Former Officers; (b) the U.S. Trustee; and (c) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Trustee submits that no other or further notice is required.

RESERVATION OF RIGHTS

19. This Motion is submitted without prejudice to, and with a full reservation of, the Trustee's rights to request and conduct any other or further discovery, pursuant to Rule 2004 or other applicable law, from any person or entity, including seeking additional and further discovery from the Tricolor Former Officers.

CONCLUSION

WHEREFORE, for the reasons stated herein, the Trustee respectfully requests entry of the Proposed Order directing the examination of the Tricolor Former Officers pursuant to Bankruptcy Rule 2004 and directing the production of documents as set forth in the Rule 2004 Requests and granting such other and further relief as the Court deems just and proper.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A** granting the relief requested herein and such other and further relief as may be just and proper.

Dated: June 17, 2026
New York, New York

MCDERMOTT WILL & SCHULTE LLP

/s/ Julia M. Beskin

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Grayson Williams (TX Bar No. 24124561)
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Darren Azman (admitted *pro hac vice*)
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Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that on June 17, 2026, a true and correct copy of the foregoing motion was served (i) via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this case, and (ii) via Priority U.S. Mail and electronic mail on the five (5) Tricolor Former Officers who are either not represented by counsel or whose counsel has not appeared in these Chapter 7 Cases.

Dated: June 17, 2026
New York, New York

MCDERMOTT WILL & SCHULTE LLP

/s/ Julia M. Beskin
Julia M. Beskin

Reed Crowe:
Via CM/ECF
Kathryn Rumsey
Kate@katerumsey.com

Katie Kollar:
Via CM/ECF
Lydia Webb
lwebb@grayreed.com

Andrew Mata:
Via CM/ECF
Jeffrey J. Ansley
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Margaret Shoop:
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Brandi Wells:
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brandi_wells@live.com

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 2004-1(A), in an attempt to try and resolve this issue without need for court intervention, the Trustee's counsel has emailed each of the Tricolor Former Officers or their legal counsel (at the addresses shown in the accompanying Certificate of Service), if known. Given the Tricolor Former Officers' relationship with the Debtor, the Trustee has an urgent need for the information they have in their possession that necessitates resolution of this Motion. Further, for those Tricolor Former Officers who have not responded to the Trustee's communications, the Trustee understands that even if she was able to confer with those Tricolor Former Officers, they would not provide the requested information voluntarily and that the Motion would have to be presented to the Court for determination.

Dated: June 17, 2026
New York, New York

MCDERMOTT WILL & SCHULTE LLP

/s/ Julia M. Beskin
Julia M. Beskin

Exhibit A

Proposed Order

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

In re:	)	Chapter 7
TRICOLOR HOLDINGS, LLC, *et al.*,[1]	)	Case No. 25-33487 (MVL)
Debtors.	)	

ORDER GRANTING THE CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

Upon the motion of the Trustee pursuant to Rules 2004 and 9016 of the Bankruptcy Rules for an order authorizing the examination of, and the production of documents by Reed Crowe, Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette

[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.

Valdivia, and Brandi Wells (the "Motion"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Trustee, the bankruptcy estate, the creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby:

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is GRANTED as set forth herein.

2. Reed Crowe, Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette Valdivia, and Brandi Wells (collectively, the "Tricolor Former Officers") shall produce the documents and other information set forth in the Requests to the offices of McDermott Will & Schulte LLP, 2801 N Harwood St., Suite 2600, Dallas, TX 75201, no later than thirty (30) days after service of the Order or by such other date as may be reasonably agreed upon by the parties.

3. The Trustee is authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.

4. This Court shall retain jurisdiction to resolve any disputes arising under or related to this Order, including any discovery disputes that may arise between or among the parties, and to interpret, implement, and enforce the provisions of this Order.

5. This Order is without prejudice to the rights of the Trustee to apply for other or further discovery from the Tricolor Former Officers, any party in interest, or other entity or person.

END OF ORDER # #

Prepared and presented by

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Exhibit B

Rule 2004 Requests For Production

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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.	(Jointly Administered)

REQUESTS FOR PRODUCTION ON CERTAIN FORMER OFFICERS OF TRICOLOR HOLDINGS, LLC

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, Anne Elizabeth Burns, Chapter 7 Trustee for the above-referenced Chapter 7 bankruptcy case ("Trustee"), hereby serves the following requests for production on Reed Crowe,

[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.

Katie Kollar, Andrew Mata, Nicholas Pizzola, Alexander Velasquez, Margaret Shoop, Janette Valdivia, and Brandi Wells (collectively, the "Tricolor Former Officers"), to be produced to the Trustee within thirty (30) days, or some such date otherwise agreed upon by the Trustee and Tricolor Former Officers, and in accordance with the Definitions and Instructions below ("Request(s)").

DEFINITIONS

1. "Asset Backed Securities" means financial instruments that were backed by a bundle of auto loans as the collateral that Tricolor pledged to the Lenders.

2. "Auditors" means Crowe Horwath LLP, Deloitte & Touche LLP, Grant Thornton LLP, and any other auditor that performed auditing services Concerning Tricolor on behalf of Tricolor or any other entity.

3. "Barclays" means Barclays Bank Delaware and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

4. "Blackrock" means BlackRock, Inc. and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

5. "CBIZ" means CBIZ, Inc. and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them,

and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

6. "Communication(s)" means any written or oral communication of any kind or character, including, by way of example and without limitation, e-mails, instant messages, text messages, voicemail or voice messages, audio recordings, recordings, transcripts or notes of in-person, video or telephone conversations, letters, meetings, memoranda, telegraphic and telex communications or transmittals of Documents, whether such communication was sent, received, or created, in final or in draft, and all Documents concerning or memorializing such written or oral communications. For the purposes of these Requests, Communications does not include internal Tricolor emails i.e. communications to or from an @tricolor.com email domain.

7. "Concerning" means consisting of, reflecting, referring to, concerning, related to, involving, evidencing, constituting, or having any legal, logical, evidential, or factual connection with (whether to support or rebut) the subject matter designated in any of these Requests. A request for Documents "concerning" a specified subject matter always shall include Communications, notes, and memoranda (whenever prepared) concerning the subject matter of the request.

8. "Corporate Credit Card" means the American Express credit cards bearing the last four digits: (1) -4039; (2) -2033; or (3) -1035.

9. "Debtor" or "Tricolor" means 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, Apoyo Financial, LLC, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

10. "Document(s)" means, without limitation, the original and all copies, prior drafts, and translation of information in any written, typed, printed, recorded or graphic form, however produced or reproduced, of any type or description, regardless of origin or location, including without limitation, all ESI, Communications, records, tables, charts, analyses, graphs, schedules, reports, memoranda, notes, lists, calendar and diary entries, letters (sent or received), contracts, statements, bills, checks, vouchers, video tapes, photographs, tape recordings, other mechanical records, transcripts or logs of any such recordings, and all other data compilations from which information can be obtained. The term "Document(s)" is intended to be at least as broad in meaning and scope as the usage of the term in or pursuant to the Federal Rules of Civil Procedure.

11. "Fifth Third" means Fifth Third Bank, N.A. and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

12. "Former Managers" means Beth Brooke, Dann Adams, Antonio Garza, Nitin Dahiya, Christian Donahue, Richard Anderson, Kathryn Petralia, Daniel Chu, and Stan Erwin.

13. "JPMorgan" means JPMorgan Chase Bank and J.P. Morgan Securities LLC, and any of their affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

14. "Lender" or "Lenders" means JPMorgan, Fifth Third, Barclays, Origin, Blackrock, TBK, and any other entity that entered into a loan agreement with Debtors.

15. "Origin" means Origin Bank and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

16. "Secured Parties" means any entity as defined in footnote 4 of the *Order Granting Chapter 7 Trustee's Amended Emergency Motion to (I) Sell Estate Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Establish Sale Procedures, and (III) Granting Related Relief*, Docket 593, and any of their affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

17. "TBK" means TBK Bank, SSB and any of its affiliates and subsidiaries, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors,

attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

18. "Trusts" means Tricolor Auto Securitization Trust 2022-1, Tricolor Auto Securitization Trust 2023-1, Tricolor Auto Securitization Trust 2024-1, Tricolor Auto Securitization Trust 2024-2, Tricolor Auto Securitization Trust 2024-3, Tricolor Auto Securitization Trust 2025-1, and Tricolor Auto Securitization Trust 2025-2.

19. "You" or "Your" means the entity or person responding to these Requests, and, if an entity, any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of any such entity, and any and all partners, officers, directors, executives, shareholders, members, employees, representatives, agents, advisors attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

INSTRUCTIONS

1. Unless otherwise indicated, all Documents shall be produced for the relevant time period, including any Documents having an earlier origin, if in use during the relevant time period. The relevant time period for each Tricolor Former Officer shall be as follows:

(a) As to Reed Crowe, August 1, 2024, to the date of these Requests;

(b) As to Katie Kollar, January 1, 2018, to the date of these Requests;

(c) As to Andrew Mata, March 1, 2019, to the date of these Requests;

(d) As to Nicholas Pizzola, January 1, 2018, to the date of these Requests;

(e) As to Alexander Velasquez, January 1, 2018, to the date of these Requests;

(f) As to Margaret Shoop, January 1, 2020, to the date of these Requests;

(g) As to Janette Valdivia, January 1, 2018, to the date of these Requests; and

(h) As to Brandi Wells, January 1, 2021, to the date of these Requests.

2. To the extent that a Request could be construed as seeking Communications in the possession, custody, or control of the estate, those Communications are excluded from the below Requests.

3. The obligation to produce Documents responsive to these Requests shall be continuing in nature, and a producing party is required promptly to produce any Documents requested herein that it locates or obtains after responding to these Requests, up to the conclusion of the above-captioned Chapter 7 case.

4. You are requested to produce not only those Documents in Your physical possession, but also those Documents as to which have the legal right and/or practical ability to obtain (and that are thus within your custody and/or control), including, without limitation, Documents in the possession of Your agents, employees, affiliates, advisors, or consultants and any other person or entity acting on Your behalf.

5. If You have no Documents responsive to a particular Request, or if for some other reason You are unable to produce responsive Documents, Your response to that Request should specifically so state. You must respond to each and every Request herein. Any objection to a Definition, Instruction or Request shall state with specificity all grounds for the objection. If You have certain Documents that are responsive to a Request, but believe that additional Documents not now available to You would also be responsive, You should provide the Documents You now have and specifically state when the remainder of the Documents will be provided.

6. Where a claim of privilege is asserted in objecting to the production of any Document and a Document called for by these Requests is withheld on the basis of such assertion, the objecting party shall identify the nature of the privilege (including work product) that is being

claimed. In addition, the objecting party shall provide the following information with respect to any Document so withheld on its privilege log: (i) type of Document, *e.g.*, letter or memorandum; (ii) general subject matter of the Document and basis for privilege; (iii) date of the Document; and (iv) author, addressee(s) or recipient(s) of the Document. Attachments to privileged emails shall be independently assessed for privilege claims and logged individually (*i.e.*, separately from the email).

7. In the event that a requested Document has been lost, destroyed, discarded and/or otherwise disposed of, You shall identify the Document by identifying: (i) its author or preparer; (ii) all persons to whom it was distributed or shown; (iii) date; (iv) subject matter; (v) attachments or appendices; (vi) date, manner, and reason for destruction or other disposition; (vii) person authorizing destruction or other disposition; and (viii) the Document Request or Requests to which the Document is responsive.

8. Instructions regarding the production of documents and electronically stored information are attached as Appendix I.

9. You are requested to answer each Interrogatory set forth below separately and completely in writing and under oath.

10. Include in Your answer information which, even if not within Your own knowledge, is nonetheless within Your custody or control, or reasonably available to You or any other source from which it may be reasonably secured.

11. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which event the reasons for Your objection shall be stated in detail. If an objection pertains to only a portion of an Interrogatory, or a word, phrase, or clause contained within it, You are required

to state Your objection to that portion only and to respond to the remainder of the Interrogatory, using Your best efforts to do so.

12. For any information withheld on the grounds that it is privileged or otherwise claimed to be excludable from discovery, identify the information or document, describe its subject matter and date, identify all authors and all recipients (including copied and blind copied recipients), and specify a basis for the claimed privilege or other grounds of exclusion.

13. If You answer any of the Interrogatories by reference to documents, You are requested to specify the production number of the documents You reference.

14. If any document responsive to the Interrogatories is no longer in existence, cannot be located, or is not in Your possession, custody, or control, identify it, describe its subject matter, and describe its disposition, including, without limitation, identifying the person having knowledge of the disposition.

15. The singular form of a word should be interpreted to include the plural as well. Any pronoun shall be construed to refer to the masculine, feminine, or neutral gender.

16. These Interrogatories are continuing in nature and Your responses to them are to be promptly supplemented or amended if, after the time of Your initial responses, You learn that any response is or has become, in some material respect, incomplete or incorrect.

17. Please take notice that these Interrogatories are submitted for the purposes of discovery and are not to be taken as waiving any objections that may be made at trial to the introduction of evidence on subjects covered by these Interrogatories or as to an admission at the trial of the relevance or materiality of any of the matters covered by these Interrogatories.

18. The parties shall confer to develop search parameters, including custodians and search terms, to identify responsive Documents.

DOCUMENTS REQUESTED

1. All Communications, including but not limited to texts or WhatsApp, between or among You and any third-party, including JPMorgan, CBIZ, TBK, Origin, Blackrock, any Lender, any of the Secured Parties, Auditors, Tricolor Former Officers, or Former Managers Concerning Tricolor, its business, its bankruptcy, or its loans, including but not limited to, warehouse loan facilities, the Lenders, loan eligibility criteria, the Trusts or their underlying collateral pool and collateral value, or compliance with warehouse loan covenants.

2. All Documents and Communications Concerning Daniel Chu's use of the Corporate Credit Cards.

3. All Documents and Communications Concerning Daniel Chu's potential, suspected or actual use of Tricolor funds for personal expenses, including but not limited to, the Audit Committee's investigation into Daniel Chu's use of Tricolor funds for personal expenses.

4. All Documents and Communications Concerning any contemplated or proposed initial public offering of Tricolor.

5. All Documents and Communications Concerning Tricolor's financial condition, including but not limited to, any analysis, review, audit, investigation, or inquiry regarding Tricolor's finances or financial condition.

6. All draft or executed agreements between You and the Debtors.

7. Documents and Communications Concerning the Debtors' business operations, lending facilities, warehousing arrangements, securitizations of auto loans originated by Tricolor, and the value of the Asset Backed Securities issued in connection with Tricolor's loans.

8. All Documents and Communications Concerning suspected or actual fraud or other wrongdoing, at Tricolor, including but not limited to:

(a) alleged double pledging of collateral;

(b) the existence of cloned loans or fictitious finance receivables;

(c) irregularities in financial reporting, internal controls, and asset management;

(d) the provision of servicer reports with fraudulent loans and loan activity;

(e) the sale of collateral protection insurance using misleading or fraudulent practices;

(f) the loss or mismanagement of customer vehicles, loans, and records;

(g) the collection of sales tax payments from borrowers without remitting such funds to the taxing authorities on their behalf;

(h) any suspected or known misstatements made by Tricolor;

9. All Documents and Communications Concerning:

(a) any deficiency or perceived deficiency in internal controls at Tricolor, including but not limited to deficiencies in internal controls at Tricolor that potentially led to an overstatement of assets or an inability to audit the fair value adjustment; and

(b) any decision not to act to remedy a deficiency or perceived deficiency in internal controls at Tricolor.

10. Documents sufficient to show Your total compensation at Tricolor.

11. All Documents and Communications Concerning the decision to file for Chapter 7 bankruptcy for Tricolor.

12. All insurance policies and indemnification agreements that cover or potentially apply to claims arising from Your service as a Tricolor Former Officer.

13. All Documents produced to and transcripts of any testimony or interview given to the DOJ, the SEC, or any state or federal regulator, prosecutor or administrative agency in connection with any civil or criminal investigations of Tricolor, including any investigation of You as pertains to your role at Tricolor.

14. Documents sufficient to show any calendar entry, appointment book(s), schedule, agenda Concerning Tricolor.

INTERROGATORIES

1. Describe your role or roles and duties at Tricolor.

2. Identify all social media accounts operated by You, including username, handle, or links, as applicable.

3. Describe Your business and/or personal relationships with each manager, officer, and executive of Tricolor, including joint business ventures or investments, service together on other boards of directors (whether for profit or non-profit), familial relationships, and social engagements.

Dated: New York, New York
June 17, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ Julia M. Beskin

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Counsel to the Chapter 7 Trustee

APPENDIX I

TECHNICAL SPECIFICATIONS FOR PRODUCTION

PRODUCTION OF DOCUMENTS ORIGINATING AS PAPER

For documents that have originated in paper format, the following specifications should be used for their production.

- Images should be produced as single page TIFF group IV format imaged at 300dpi.
- Each filename must be unique and match the Bates number of the page. The filename should not contain any blank spaces and should be zero padded (for example ABC00000001).
- Media may be delivered on CDs, DVDs, or External USB hard drives. Each media volume should have its own unique name and a consistent naming convention (for example ZZZ001 or SMITH001).
- Each delivery should be accompanied by an image cross reference file that contains document breaks.
- A delimited text file that contains available fielded data should also be included and at a minimum include Beginning Bates Number, Ending Bates Number, Custodian, and Number of Pages. The delimiters for that file should be:

  Field Separator, ASCII character 020: "¶"
  Quote Character, ASCII character 254 "þ"

  Multi-Entry Delimiter, ASCII character 059: ";"
- To the extent that documents have been run through an Optical Character Recognition (OCR) software in the course of reviewing the documents for production, full text should also be delivered for each document. Text should be delivered on a document level in an appropriately formatted text file (.txt) that is named to match the first Bates number of the document.
- A text cross reference load file should also be included with the production delivery that lists the beginning Bates number of the document and the relative path to the text file for that document on the production media.

PRODUCTION OF EMAIL AND ELECTRONIC DOCUMENTS

Electronic documents should be produced in such fashion as to identify the location (*i.e.*, the network file folder, hard drive, back-up tape or other location) where the documents are stored and, where applicable, the natural person in whose possession they were found (or on whose hardware device they reside or are stored). If the storage location was a file share or work group folder, that should be specified as well.

Attachments, enclosures, and/or exhibits to any parent documents should also be produced and proximately linked to the respective parent documents containing the attachments, enclosures, and/or exhibits.

For standard documents, emails, and presentations originating in electronic form, documents should be produced as tiff images using the same specifications above with the following exceptions:

- Provide a delimited text file (using the delimiters detailed above) containing the following extracted metadata fields where they exist in the file being produced:

  Beginning Production
  Number Ending Production
  Number Beginning
  Attachment Range Ending
  Attachment Range Custodian

  Custodian_ALL
  Confidentiality
  Designation Original
  Location Path Email
  Folder Path Document
  Type Edoc_Author

  Edoc_Title
  Page Count
  File Name
  File
  Extension
  File Size
  MD5 Hash

  Date Last Modified

  Time Last Modified
  [HH:MM:SS] Date Created

Time Created [HH:MM:SS]
Date Last Accessed

Date Sent

Time Sent [HH:MM:SS]
Date Received

Time Received
[HH:MM:SS] From

Recipients
Copyees

Blind Copyees
Email Subject
Path to Native
File

Calendar Start Date
Calendar End Date

- Images shall be produced revealing any hidden text/content.

- Extracted full text (not OCR text) should also be delivered for each electronic document. The extracted full text should be delivered on a document level according to the specifications above similar to paper documents.

- Foreign language text files and metadata should be delivered with the correct encoding to enable the preservation of the documents' original language.

- All spreadsheets should be produced in their native format and in the order that they were stored in the ordinary course of business, *i.e.*, emails that attach spreadsheets should not be separated from each other and should be linked using the Attachment Range fields above. The extractable metadata and text should be produced in the same manner as other documents that originated in electronic form. A placeholder TIFF image shall be created, Bates numbered, and the produced Excel chart shall be renamed to match the Bates number on its corresponding placeholder page. The exception shall be for redacted spreadsheets which shall be produced in TIFF format. Images for the redacted spreadsheets shall display the content in the same manner as if it were printed. The parties agree to work out a future protocol governing the use and format of documents produced pursuant to this paragraph at trial, depositions, or hearings (such as converting to tiff images in accordance with the above protocol).

- Upon review, the requesting party may ask for certain other documents and/or databases that were initially produced in their tiff or pdf format to be produced

in their native format in the event that the tiff or pdf version is not reasonably usable. If this is the case, the requesting party will submit a list of Bates numbers identifying the documents. The documents should be produced in their unaltered native format with an accompanying text delimited text file (using the delimiters above) that contains the following fields:

Beginning Production
Number Ending Production
Number Beginning
Attachment Range Ending
Attachment Range Path to
Native File

MD5 Hash Value

PRODUCTION OF DATABASES AND OTHER STRUCTURED DATA

Generally, databases should be produced in a mutually agreeable data exchange format. To determine the data that is relevant to the document requests, a list of databases and systems used to manage relevant data should be provided with the following information:

Database Name

Type of Database

Software Platform

Software Version

Business Purpose Users

Size in Records Size in Gigabytes

A List of Standard Reports

Database Owner or Administrator's Name Field List

Field Definitions (including field type, size, and use)

Upon review of the list, the parties agree to meet and confer regarding the data to be produced from each source, if any, and the form(s) of the production thereof.

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

In Re:	§	
	§	
TRICOLOR HOLDINGS, LLC, et al.,	§	
Debtors,	§	**Chapter 7**
	§	
	§	**CASE NO. 25-33487 (MVL)**
	§	
	§	
,	§	

DECLARATION IN SUPPORT OF MOTION FOR SUBSTITUTED SERVICE

My name is Amine Jomni. I am over the age of eighteen (18) years, fully competent to testify to the matters stated herein, and am not a party to or interested in the outcome in the above styled and numbered cause. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP." I have personal knowledge of the facts and statements contained in this Declaration and aver that each is true and correct.

It is impractical to secure service of process on **JANETTE VALDIVIA**, in the above entitled and numbered cause, in person, a true and correct copy of the ORDER GRANTING THE CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS and CERTIFICATE OF NO OBJECTION REGARDING ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS with EXHIBIT A and CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CERTAIN FORMER OFFICERS AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS with EXHIBITS A & B Personal service is impractical because said defendant absents themself and thereby evades service.

I **believe the most reasonable, effective way to give JANETTE VALDIVIA actual notice of this suit is by delivering a copy of said documents to anyone over the age of sixteen (16), OR by affixing to the front door or entry gate at 809 BLACKHORSE TRAIL, JUSTIN, TX 76247, a location where they can probably be found.**

I have attempted to personally deliver said documents upon the defendant on the following days and times, but have been unsuccessful for the following reasons:

Saturday, August 1, 2026, 10:11 AM – The aforementioned documents came to my hand.

Saturday, August 1, 2026 11:30 AM - AT 809 BLACKHORSE TRAIL – I attempted service and received no answer at the door. I left my contact card at the door.

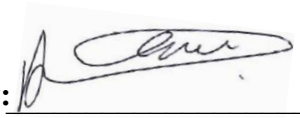
Monday, August 3, 2026 8:03 PM - AT 809 BLACKHORSE TRAIL – I attempted service and received no answer at the door. While I was at the door, a Hispanic male pulled in the driveway. I asked him about the defendant he denied any knowledge of her and told me that I have the wrong address.

Thursday, August 6, 2026 6:30 PM – The Denton Central Appraisal District shows the defendant owns the home (SEE EXHIBIT A), so I returned to 809 Blackhorse Trail and received no answer at the door. I observed two vehicles parked in the driveway with license plates PJY 7272 and WBL 5577, which are registered to the defendant according to the Texas Department of Motor Vehicles (SEE EXHIBIT B). I also observed a package by the door addressed to the defendant (SEE EXHIBIT C).

Saturday, August 8, 2026 10:07 AM - AT 809 BLACKHORSE TRAIL – I attempted service and as I pulled up in front of the house, a female drove off in a white Jeep with license plate PJY 7272 that is registered to the defendant.

My name is Amine Jomni, I am at least 18 years old, and my business address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Thursday, August 13, 2026

By: 

Amine Jomni - PSC 25994 - Exp 03/31/27

EXHIBIT A

https://www.dentoncad.com/property-detail/972775/2027

PID 972775 | 809 BLACKHORSE TRL

Property Summary Report | 2027
Online Services | Denton Central Appraisal District

GENERAL INFO

ACCOUNT

Property ID:	972775
Geographic ID:	SJ0240A-0000053-0000-0026-0000
Type:	R
Zoning:	
Agent:	O'CONNOR & ASSOCIATES
Legal Description:	TRAILS OF ELIZABETH CREEK PHASE 7 BLK 53 LOT 26
Property Use:	

LOCATION

Address:	809 BLACKHORSE TRL, FT WORTH TX 76247
Market Area:	
Market Area CD:	DC36018
Map ID:	NW03

PROTEST

Protest Status:	
Informal Date:	
Formal Date:	

OWNER

Name:	VALDIVIA, MILAGROS JANETTE
Secondary Name:	
Mailing Address:	809 BLACKHORSE TRL JUSTIN TX US 76247-1966
Owner ID:	1774047
% Ownership:	100.000000
Exemptions:	HS - Homestead

EXHIBIT B

LIC PJY7272 APR/2027 OLD # PJY7272 APR/2026 EWT 3900 GWT 3900
PASSENGER-TRUCK PLT, STKR REG CLASS 25 $ 78.25 DENTON CNTY
TITLE 22011044598135007 ISSUED 02/16/2022 ODOMETER 7004 REG DT 03/31/2026
YR:2020 MAK:JEEP MODL:CHE BDY STYL:LL VEH CLS:PASS-TRK SALE PRC: $26998.00
VIN: 1C4PJMLB3LD584553 BODY VIN: COLOR: WHITE
PREV TTL: JUR TX TTL # 28695344550005461 ISSUE 12/23/2021
PREV OWN MILAGROS JANETTE VALDIVI,FORT WORTH,TX
OWNER MILAGROS JANETTE VALDIVIA,,3011 HALE,,FORT WORTH,TX,76106
RNWL RCP JANETTE VALDIVIA,809 BLACKHORSE TRL,,NORTHLAKE,TX,76247
LIEN 11/15/2021,TEXAS TRUST CREDIT UNION,,PO BOX 2260,,MANSFIELD,TX,7606
3
PLATE AGE: 5 LAST ACTIVITY 05/02/2026 TRENEW OFC: 061
REMARKS ACTUAL MILEAGE.DATE OF ASSIGNMENT:2021/04/10.E-REMINDER.E

LIC WBL5577 DEC/2026 OLD # WBL5577 DEC/2025 EWT 5000 GWT 6000
PASSENGER-TRUCK PLT, STKR REG CLASS 35 $ 78.25 DENTON CNTY
TITLE 06130945679092743 ISSUED 02/01/2025 ODOMETER N/A REG DT 01/06/2026
YR:2004 MAK:CHEV MODL:SIL BDY STYL:PK VEH CLS:TRK<=1 SALE PRC: $1860.00
VIN: 1GCEK19T84E188875 BODY VIN: COLOR: WHITE
PREV TTL: JUR TX TTL # 22036844944131654 ISSUE 01/28/2023
PREV OWN JOHNNY ANGEL MONTOYA,FORT WORTH,TX
OWNER MILAGROS JANETTE VALDIVIA,,809 BLACKHORSE TRL,,JUSTIN,TX,76247
RNWL RCP JANETTE VALDIVIA,809 BLACKHORSE TRL,,NORTHLAKE,TX,76247
PLATE AGE: 1 LAST ACTIVITY 01/17/2026 TRENEW OFC: 061
REMARKS DATE OF ASSIGNMENT:2025/01/22.E-REMINDER.PAPER TITLE. ELECTRONIC REN
EWAL NOTICE.FUEL TYPE: GAS.

EXHIBIT C

