Docket #1432 Date Filed: 09/03/2026

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)

STIPULATED DOCUMENT SCOPE AND PRODUCTION PROTOCOL REGARDING RULE 2004 PRODUCTION OF DOCUMENTS BY WILMINGTON TRUST, N.A. AND WILMINGTON TRUST COMPANY AND WITHDRAWAL OF MOTION BY THE CHAPTER 7 TRUSTEE

Anne Elizabeth Burns, as Chapter 7 Trustee (the "Trustee") for Tricolor Holdings, LLC, *et al*. (the "Debtors"), Wilmington Trust, N.A. and Wilmington Trust Company (together, "Wilmington," and collectively with the Trustee, the "Parties"), hereby enter this Stipulation 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 the 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, the Motion included a set of Rule 2004 Requests for Production (the "2004 Requests");

[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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WHEREAS, the Parties met and conferred regarding the Motion, the 2004 Requests, and the production of documents from Wilmington;

WHEREAS, the Parties agreed to the scope of a first priority document production by Wilmington in response to the Rule 2004 Requests (the "First Priority Production");

WHEREAS, on August 12, 2026, Wilmington made the voluntary First Priority Production to the Trustee; and

WHEREAS, the Parties have agreed to the scope of the remaining document production to be made by Wilmington in response to the Motion and Rule 2004 Requests as set forth in the Parties' email exchange(s) dated July 31, 2026 and August 3, 2026 (the "Remaining Production");

IT IS THEREFORE STIPULATED BY THE PARTIES THAT:

1. The Trustee withdraws the Motion without prejudice.

2. Wilmington shall produce the Remaining Production to the Trustee no later than September 23, 2026.

3. As set forth in the Parties' email exchange dated September 2-3, 2026, nothing in this Stipulation shall be deemed a waiver of, or shall prejudice, any Party's rights, claims, defenses, or objections, including, without limitation, (a) the Trustee's right to seek an additional Rule 2004 examination or production of documents from Wilmington or any of its affiliates, and (b) Wilmington's (or any such affiliates') right to object to any such request on any applicable ground.

4. This Stipulation resolves the Motion at ECF No. 1287, and Wilmington shall have no further obligation to respond to the Motion or produce documents or information in response to the 2004 Requests other than as set forth in this Stipulation.

END OF STIPULATION # #

AGREED TO FORM AND SUBSTANCE:

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