Docket #1437 Date Filed: 09/10/2026

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)
	[Related to Dkt. No. 1353]

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 FTI CONSULTING, INC. 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 FTI Consulting, Inc. ("FTI," collectively with the Trustee, the "Parties," and

[1] The Debtors in these chapter 7 cases are reported 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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each individually a "Party") hereby enter into this Stipulation and Agreed Order and agree as follows:

WHEREAS, on July 30, 2026, the Trustee filed that certain *Chapter 7 Trustees' Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 (i) Directing Examination of FTI Consulting Inc. and Certain Affiliates and (ii) Directing the Production of Documents* [ECF No. 1353] (the "Motion");

WHEREAS, FTI's response to the Motion, if any, was originally returnable on or before August 24, 2026;

WHEREAS, the Court granted a stipulated extension to FTI's response time on August 21, 2026 [ECF No. 1404], which extended FTI's response, if any, to the Motion to September 14, 2026.

WHEREAS, to allow the Parties time to continue to confer regarding the Motion and attempt to reach a consensual resolution of the issues raised by the Motion, the Parties have agreed to further extend the deadline for FTI to file a response to the Motion, if any, to September 28, 2026; and

WHEREAS, FTI does not waive and instead preserves all of its rights and potential objections as to the Motion and the requests contained therein.

IT IS THEREFORE STIPULATED AND AGREED BY THE PARTIES AND ORDERED BY THE COURT THAT:

1. The return date on FTI's response to the Motion, if any, is extended until September 28, 2026.

###End of Order###

AGREED TO FORM AND SUBSTANCE:

Respectfully submitted,

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