Docket #1439 Date Filed: 09/14/2026

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 September 11, 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) |
| | [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.

25334872609140000000000001

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,

*/s/ Gretchen Scavo*
**WINSTON TAYLOR LLP**
Gretchen Scavo
300 N. LaSalle Dr., Suite 4400
Chicago, IL 60654-3406
Tel: 312-558-5600
E-mail:
gretchen.scavo@winstontaylor.com

*Counsel to FTI Consulting Inc.*

*/s/ Julia M. Beskin*
**MCDERMOTT WILL & SCHULTE LLP**
Charles R. Gibbs (TX Bar No. 7846300)
Grayson Williams (TX Bar No. 24124561)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201-1664
Tel: (214) 295-8000
Fax: (972) 232-3098
E-mail: crgibbs@mcdermottlaw.com
gwilliams@mcdermottlaw.com

-and-

Darren Azman (admitted pro hac vice)
Jared M. Gerber (admitted pro hac vice)
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: (212) 547-5400
Fax: (212) 547-5444
E-mail: dazman@mcdermottlaw.com
jmgerber@mcdermottlaw.com

Julia M. Beskin (admitted pro hac vice)
919 Third Avenue
New York, New York 10022
Tel: (212) 547-5400
Fax: (212) 547-5444
E-mail: jbeskin@mcdermottlaw.com

*Counsel to the Chapter 7 Trustee*