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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 WITHDRAWAL OF CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF CROWE HORWATH LLP AND CERTAIN AFFILIATES AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that, Anne Elizabeth Burns, in her capacity as the Chapter 7 trustee (the "Trustee") of the estates of the Debtors in the above-captioned Chapter 7 proceedings,

[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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by and through her undersigned counsel, hereby withdraws the *Chapter 7 Trustee's Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 (I) Directing Examination of Crowe Horwath LLP and Certain Affiliates and (II) Directing the Production of Documents* [Docket No. 967] (the "Motion").

The Trustee reserves all rights to later seek to renew the Motion or serve further discovery requests.

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Dated: September 18, 2026
Dallas, Texas

Respectfully submitted,

/s/ Eric D. Madden

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Special Litigation Counsel
to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that, on September 18, 2026, a true and correct copy of the foregoing document was served via (i) 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) email on Crowe Horwath LLP's counsel, Kevin McDonough (Kevin.McDonough@lw.com).

/s/ Eric D. Madden
Eric D. Madden