Docket #1442 Date Filed: 09/18/2026

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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 APPROVING LANDLORD ADMINISTRATIVE EXPENSE CLAIM RESOLUTION PROCEDURES

On August 24, 2026, Anne Elizabeth Burns, the Chapter 7 trustee (the "Trustee") of the estates of the above-captioned debtors (the "Debtors"), filed the *Chapter 7 Trustee's Motion to Set Landlord Administrative Expense Claim Resolution Procedures* [Docket No. 1406] (the "Motion"). The Trustee hereby certifies that the following are true and correct to the best of her knowledge:

[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.

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1. Service of the Motion was timely made on all parties entitled to service by ECF on August 24, 2026. (*See* Docket No. 1406.) The Motion was also served on (i) the Office of the U.S. Trustee, (ii) all of Debtors' known landlords, and (iii) all creditors known to the Trustee to have asserted (a) a secured claim against the Debtors or (b) a security interest in any property of the Debtors, and (c) where available, such creditors' counsel by Kurtzman Carson Consultants LLC d/b/a Verita Global, the Trustee's claims and noticing agent, on August 25, 2026, by electronic mail and/or first class mail. (*See* Docket No. 1417.)

2. Objections were due to be filed with the Court no later than close of business on September 18, 2026 (the "Objection Deadline").

3. No formal objections to or requests for hearing on the Motion were received by the undersigned nor filed with the Court and docketed in the case file by the Objection Deadline.

4. The Trustee received informal comments from TBK Bank, SSB which are incorporated in the revised form of order attached hereto as **Exhibit A** (the "Revised Proposed Order").

5. Attached hereto as **Exhibit B** is a redline comparison of the Proposed Order (as defined in the Motion) and the Revised Proposed Order.

6. The Trustee respectfully requests that the Court enter the Revised Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

[Remainder of Page Left Intentionally Blank]

Dated: Dallas, Texas
September 18, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ Eric C. Seitz

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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 CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in these cases.

/s/ Eric C. Seitz
Eric C. Seitz

EXHIBIT A

Revised Proposed Order

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.	)	

ORDER APPROVING LANDLORD
ADMINISTRATIVE EXPENSE CLAIM RESOLUTION PROCEDURES

On this day, the Court considered the *Chapter 7 Trustee's Motion to Set Landlord Administrative Expense Claim Resolution Procedures* (the "Motion"),[2] filed by Anne Elizabeth Burns, Chapter 7 Trustee in this case, on August 24, 2026 [Docket No. 1406]. The Court, having determined that adequate notice of the Motion was provided, and no formal objections to or

[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 not defined herein shall have the meanings given to them in the Motion.

requests for hearing were received or filed, is of the opinion that the Motion should be granted. It is therefore;

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that the following procedures (the "Procedures") be approved with respect to allowance of Admin Proofs of Claim:

(i) Parties in interest other than the Trustee[3] shall have 24 days from the date this Order is filed to object to any Admin Proof of Claim.

(ii) If no third-party objections to an Admin Proof of Claim are timely filed, the Trustee and the applicable claimant may resolve the liquidated amount of the applicable Landlord Claim via stipulation and agreed order approved by the Court without the necessity of the Trustee first objecting to the claim.

(iii) If a third-party objection to an Admin Proof of Claim is timely filed, the objecting party, the Trustee and the applicable claimant may resolve the liquidated amount of the claim via stipulation and agreed order approved by the Court.

(iv) Notwithstanding the foregoing set forth in subsections (i), (ii), and (iii), the Trustee may, in her discretion, extend the time for any party in interest to file an objection to an Admin Proof of Claim if the Trustee determines that such extension would be helpful to facilitate negotiations toward a stipulated resolution of such Admin Proof of Claim; provided, however, that no such extension shall extend beyond the deadline by which the Trustee is required to resolve such Admin Proof of Claim.

(v) Unless and until an Admin Proof of Claim is (i) objected to or (ii) resolved via stipulation and agreed order, such Admin Proof of Claim shall constitute *prima facie* evidence of the claim's validity and amount pursuant to Bankruptcy Rule 3001(f).

(vi) Any Admin Proof of Claim for which an objection, but no stipulation and agreed order approved by the Court, has been filed shall otherwise be resolved pursuant to notice and a hearing as set forth in Bankruptcy Rule 3007(a).

END OF ORDER

[3] No claims objection deadline has been set with respect to the Trustee.

Submitted by:

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Counsel to the Chapter 7 Trustee

EXHIBIT B

Redline

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.	)	

ORDER APPROVING LANDLORD
ADMINISTRATIVE EXPENSE CLAIM RESOLUTION PROCEDURES

On this day, the Court considered the *Chapter 7 Trustee's Motion to Set Landlord Administrative Expense Claim Resolution Procedures* (the "Motion"),[~~1~~2] filed by Anne Elizabeth Burns, Chapter 7 Trustee in this case, on August ~~[●]~~24, 2026 [Docket No. ~~[●]~~1406]. The Court, having determined that adequate notice of the Motion was provided, and no ~~responses~~

[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.

[~~1~~2] Capitalized terms not defined herein shall have the meanings given to them in the Motion.

~~or~~formal objections to or requests for hearing were received or filed, is of the opinion that the Motion should be granted. It is therefore;

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that the following procedures (the "Procedures") be approved with respect to allowance of Admin Proofs of Claim:

~~(i)~~ (i) Parties in interest other than the Trustee[2][3] shall have 24 days from the date this Order is filed to object to any Admin Proof of Claim.

~~(ii)~~ (ii) If no third-party objections to an Admin Proof of Claim are timely filed, the Trustee and the applicable claimant may resolve the liquidated amount of the applicable Landlord Claim via stipulation and agreed order approved by the Court without the necessity of the Trustee first objecting to the claim.

~~(iii)~~ (iii) If a third-party objection to an Admin Proof of Claim is timely filed, the objecting party, the Trustee and the applicable claimant may resolve the liquidated amount of the claim via stipulation and agreed order approved by the Court.

(iv) Notwithstanding the foregoing set forth in subsections (i), (ii), and (iii), the Trustee may, in her discretion, extend the time for any party in interest to file an objection to an Admin Proof of Claim if the Trustee determines that such extension would be helpful to facilitate negotiations toward a stipulated resolution of such Admin Proof of Claim; provided, however, that no such extension shall extend beyond the deadline by which the Trustee is required to resolve such Admin Proof of Claim.

~~(iv)~~ (v) Unless and until an Admin Proof of Claim is (i) objected to or (ii) resolved via stipulation and agreed order, such Admin Proof of Claim shall constitute *prima facie* evidence of the claim's validity and amount pursuant to Bankruptcy Rule 3001(f).

~~(v)~~ (vi) Any Admin Proof of Claim for which an objection, but no stipulation and agreed order approved by the Court, has been filed shall otherwise be resolved pursuant to notice and a hearing as set forth in Bankruptcy Rule 3007(a).

END OF ORDER

~~2~~[3] No claims objection deadline has been set with respect to the Trustee.

Submitted by:

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