Docket #1448 Date Filed: 09/25/2026

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 RESOLVING 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 (the "Stipulation"):

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 Parties agreed to further extensions of FTI's response, if any, to the Motion, with the last such extension to September 28, 2026 [ECF No. 1439];

WHEREAS, FTI does not waive and instead preserves all of its rights and potential objections as to the Motion;

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

1. The Parties have agreed to certain search parameters in connection with the production of documents in response to the Motion as limited by, among other things, custodian, search period and search terms (the "Search Parameters").

2. In full and final resolution of the Motion, the Parties have agreed that FTI's will produce all non-privileged documents responsive to the Requests that are located by the Search Parameters, no later than thirty (30) days after the filing of this Stipulation or by such other date as may be reasonably agreed upon by the Parties.

3. Nothing herein shall be deemed a waiver of any objections or rights FTI may have regarding the Requests, whether under Rule 34 of the Federal Rules of Civil Procedure or otherwise,

and all rights are reserved to the Trustee with respect to same, including the Trustee's right to request additional Search Parameters after FTI has made its production and FTI's right to object to same.

4. This Stipulation resolves the Motion at ECF No. 1353, and FTI shall have no further obligation to produce documents in relation to the Motion.

5. All productions made by FTI in response to the Requests will be pursuant to the *Order Approving Stipulated Confidentiality Agreement and Protective Order*, ECF No. 695, entered on January 23, 2026 in these chapter 7 cases.

###End of Order###

AGREED TO FORM AND SUBSTANCE:

Respectfully submitted,

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