Docket #1457 Date Filed: 10/06/2026

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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.	)	

CHAPTER 7 TRUSTEE'S MOTION FOR EXPEDITED CONSIDERATION OF SECOND EMERGENCY MOTION FOR ENTRY OF AN ORDER EXTENDING THE VEHICLE SALES DEADLINE

Anne Elizabeth Burns, the Chapter 7 trustee (the "Trustee") of the estates of the above-captioned debtors (the "Debtors"), hereby moves (the "Motion") for entry of an order, substantially in the form attached as **Exhibit A** (the "Proposed Order") granting the relief described below. In support of the Motion, the Trustee respectfully states as follows:

[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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RELIEF REQUESTED

1. By this Motion, the Trustee seeks entry of the Proposed Order, shortening notice and scheduling an expedited hearing on the *Chapter 7 Trustee's Second Emergency Motion for Entry of an Order Extending the Vehicle Sales Deadline* [Docket No. 1455] (the "Second Deadline Extension Motion"),[2] to be held on **October 14, 2026, at 9:30 a.m. (prevailing Central Time)**.

2. As described in the Second Deadline Extension Motion, the circumstances of this matter justify consideration of the Second Deadline Extension Motion on an expedited basis. If the Second Deadline Extension Motion is not heard on an expedited basis, the Vehicle Sales Deadline will pass before a ruling can be made on the Second Deadline Extension Motion. If the Vehicle Sales Deadline lapses and the sale process is cut short, the Debtors' estates will face irreparable harm as the Vehicles' value will continue to depreciate without a ready alternative path to sell the Vehicles. A delay in the sale of the Vehicles caused by the need to renegotiate a new sale process would be detrimental. Accordingly, shortening notice and scheduling an expedited hearing is necessary to prevent irreparable harm to the bankruptcy estates and to preserve estate property pending final adjudication of the Second Deadline Extension Motion.

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, shortening notice and scheduling an expedited hearing on the Second Deadline Extension Motion, to be held on **October 14, 2026, at 9:30 a.m. (prevailing Central Time)**.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Second Deadline Extension Motion.

Dated: Dallas, Texas
October 6, 2026

Respectfully submitted,

/s/ Grayson Williams

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Counsel to the Chapter 7 Truste

CERTIFICATE OF SERVICE

I do hereby certify that on October 6, 2026, a true and correct copy of the foregoing Motion was served on all parties authorized to receive electronic notice in this case via the CM/ECF system for the United States Bankruptcy Court for the Northern District of Texas,

/s/ Grayson Williams
Grayson Williams

CERTIFICATE OF CONFERENCE

I do hereby certify that the Trustee believes that the number of parties with an interest in the Motion is too numerous to contact prior to the filing of the Motion.

/s/ Grayson Williams
Grayson Williams

EXHIBIT A

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 GRANTING EXPEDITED CONSIDERATION OF CHAPTER 7 TRUSTEE'S SECOND EMERGENCY MOTION FOR ENTRY OF AN ORDER EXTENDING THE VEHICLE SALES DEADLINE

Upon the motion (the "Motion")[2] of Anne Elizabeth Burns, the Chapter 7 trustee (the "Trustee") for Tricolor Holdings, LLC and its various debtor affiliates (collectively, the

[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 used but not otherwise defined herein shall have the respective meanings ascribed to them in the Motion.

"Debtors"), for entry of an order (this "Order"), shortening notice and scheduling an expedited hearing on the *Chapter 7 Trustee's Second Emergency Motion for Entry of an Order Extending the Vehicle Sales Deadline* [Docket No. [-]] (the "Second Deadline Extension Motion"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc dated August 3, 1984*, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests and without prejudice to the rights of the Trustee, the Debtors, their estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.

2. The Second Deadline Extension Motion will be heard on **October 14, 2026, at 9:30 a.m. (prevailing Central Time)**.

END OF ORDER # #

Submitted by:

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-and-

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