Docket #1464 Date Filed: 10/09/2026

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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.	)	

WITNESS AND EXHIBIT LIST OF THE CHAPTER 7 TRUSTEE
FOR HEARING SCHEDULED ON OCTOBER 14, 2026

Anne Elizabeth Burns, solely in her capacity as the duly appointed Chapter 7 bankruptcy trustee (the "Trustee") for Tricolor Holdings, LLC and its various debtor affiliates, hereby files this *Witness and Exhibit List of the Chapter 7 Trustee for Hearing Scheduled on October 14, 2026* (the "Witness and Exhibit List") in connection with the matters scheduled for hearing on October 14, 2026, at 2:30 p.m. (prevailing Central Time) (the "Hearing"):

[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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WITNESSES

1. Steve Nolan, Automotive Rentals, Inc. t/a Holman;

2. Anthony Sperelakis, Vervent Inc.;

3. Any witness listed, offered, or called by any other party or party in interest;

4. Any witness necessary to authenticate a document; and

5. Any witness required for rebuttal or impeachment.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Any paper or pleading on file in these cases				
2.	Any exhibits listed, designated, or offered by any other party or party in interest				
3.	Any exhibits necessary for rebuttal				

RESERVATION OF RIGHTS

The Trustee reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the orders of this Court. The Trustee reserves the right to offer into evidence any other exhibit designated by any other party in connection with the hearing on these matters. The Trustee also reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

Dated: Dallas, Texas
October 9, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ Grayson Williams

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-and-

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CERTIFICATE OF SERVICE

I do hereby certify that on October 9, 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 this case.

/s/ Grayson Williams
Grayson Williams