Docket #1478 Date Filed: 10/23/2026

CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Michelle V. Larson

Signed October 22, 2026

United States Bankruptcy Judge

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-mvl7
	§	
Debtors.	§	(Jointly Administered)
	§	

STIPULATION AND AGREED ORDER REGARDING BULLISH RESOURCES, INC.'S ADMINISTRATIVE CLAIM

Bullish Resources, Inc. ("Bullish" or the "Landlord") and Anne Elizabeth Burns, as Chapter 7 Trustee (the "Trustee" and together with the Landlord, the "Parties") for the bankruptcy estates of the above-captioned debtors (the "Debtors"), hereby enter into this Stipulation and Agreed Order (the "Agreed Order") and stipulate and agree 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, TAG Asset Funding, LLC, and Apoyo Financial, LLC.

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WHEREAS, on September 10, 2025 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas (the "Court");

WHEREAS, the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, and this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2);

WHEREAS, prior to the Petition Date, the Landlord and Tricolor Holdings, LLC (the "Debtor Tenant") entered into that certain Commercial Lease Agreement dated June 12, 2020 (the "Bandera Lease") covering real property located at 6300 E. Bandera, Leon Valley, Texas 78238 (the "Premises");

WHEREAS, on October 20, 2025, the Landlord filed, along with ANC Ventures, LTD., their *Amended Motion to Compel the Trustee to Pay Post-Petition Rent or Alternatively Compelling the Trustee to Reject Certain Nonresidential Leases* [Docket No. 229] (the "Amended Motion to Compel") seeking certain relief as to the Bandera Lease and as to a separate Commercial Lease Agreement dated September 14, 2020, as amended, for certain real property located at 3720 E. Saunders, Laredo, Texas 78041;

WHEREAS, on October 27, 2025, the Trustee filed her *Chapter 7 Trustee's First Omnibus Motion for Entry of an Order (I) Authorizing the Trustee to (A) Reject Certain Unexpired Real Property Leases and (B) Abandon Personal Property and (ii) Granting Related Relief* [Docket No. 269] (the "Lease Rejection Motion");[2]

WHEREAS, on November 10, 2025, the Trustee filed her *Omnibus Objection to Motions to Compel the Trustee to Pay Post-Petition Rent or Alternatively Compelling the Trustee to Reject Certain Nonresidential Leases* [Docket No. 354] (the "Omnibus Objection"), which responded to,

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

among other things, the Landlord's Motion to Compel.

WHEREAS, on November 14, 2025, the Court entered the Trustee and Landlord's *Stipulation and Agreed Order for Lease Rejection* [Docket No. 393] (the "Lease Rejection Order"), pursuant to which the Debtor rejected the Bandera Lease as of "…*the later of the date on which all vehicles have been removed from the Premises (which date shall in no event be later than November 17, 2025) and the date of entry of an order by the Court approving this Stipulation and Agreed Order…[and] [i]n the event that all vehicles have not been removed from the Premises by November 17, 2025 at 11:59 p.m. (prevailing central time), this Stipulation and Agreed Order will be void in all respects, unless otherwise agreed to by the Landlord in writing*."

WHEREAS, all of the vehicles were removed from the Premises by November 21, 2025, which removal date was otherwise agreed to by the Landlord through written emails; thus, the Stipulation in the Lease Rejection Order was not voided, and the effective date of rejection of the Bandera Lease was November 21, 2025;

WHEREAS, on May 26, 2026, the Landlord filed its Proof of Claim [POC No. 83];

WHEREAS, on June 23, 2026, the Landlord filed its Amended Proof of Claim [POC No. 83-3] (the "Amended POC"), asserting, among other claims, an administrative claim totaling **$47,012.94** pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 507(a)(2), as actual, necessary costs and expenses of preserving the chapter 7 estate;

WHEREAS, the Parties conferred and desire to resolve certain pending issues relating to the Landlord's proof of claim and allowance of administrative expenses on the terms set forth herein.

IT IS HEREBY AGREED BY THE PARTIES AND UPON APPROVAL OF THE COURT, IT IS SO ORDERED

1. The relief requested in this Agreed Order is in the best interest of the Trustee, the Debtors' estates and other parties in interest.

2. Bullish Resources, Inc. (the "Claimant") shall have an allowed administrative expense claim in the amount of $47,012.94 against the Debtors' estates pursuant to section 503(b)(1) of the Bankruptcy Code (the "Allowed Administrative Claim").

3. The Allowed Administrative Claim shall be paid *pari passu* with other claims allowed under section 503(b) of the Bankruptcy Code, if and when such claims are paid.

4. Nothing in this Order shall affect (i) the Claimant's right to maintain, supplement and/or amend the unsecured, prepetition claim component in the Amended POC, or otherwise timely assert a prepetition claim against the Debtors' estates, including any claim for unpaid prepetition rent, by filing or maintaining a proof of claim in accordance with the Bankruptcy Code, Bankruptcy Rules, and any applicable orders of this Court or (ii) the Trustee's right to object to any such unsecured claim.

5. Except as expressly provided herein, all rights, claims, defenses, and objections of the parties are reserved.

6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF ORDER

AGREED AND APPROVED FOR ENTRY:

/s/ Michael S. Held

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