Docket #1486 Date Filed: 10/30/2026

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)

STIPULATION AND AGREED ORDER REGARDING THE TIME TO RESPOND TO CHAPTER 7 TRUSTEE'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF ARES AGENT SERVICES, L.P. AND ARES MANAGEMENT LLC 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 Ares Agent Services, L.P. and Ares Management LLC (together, "Ares," and collectively with the Trustee, the "Parties"), hereby enter into this Stipulation and Agreed Order 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.

25334872610300000000000001

WHEREAS, on July 8, 2026, the Trustee filed her *Chapter 7 Trustee's Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 (I) Directing Examination of Ares Agent Services, L.P. and Ares Management LLC and (II) Directing the Production of Documents* [ECF No. 1297] (the "Motion");

WHEREAS, Ares's response to the Motion was originally returnable on or before July 29, 2026;

WHEREAS, the Parties previously extended Ares's response time to the Motion to on or before August 29, 2026, and again to on or before September 29, 2026, and again to on or before October 30, 2026;

WHEREAS, Ares has agreed in principle to make voluntary productions to the Trustee;

WHEREAS, Ares made a production of documents to the Trustee on August 18, 2026, which Trustee is currently reviewing;

WHEREAS, the Parties are continuing to confer regarding voluntary productions by Ares that would obviate the need for the Court to rule on the Trustee's Motion;

WHEREAS, to provide time for the Parties to complete their conferral process and for Ares to complete its productions, to the extent any additional productions are made, the Parties have agreed to move the deadline for Ares to file a response to the Motion, if any, to November 30, 2026;

WHEREAS, Ares does not waive and instead preserves all 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 deadline for Ares's response to the Motion, if any, is extended until November 30, 2026.

###End of Order###

AGREED TO FORM AND SUBSTANCE:

/s/ *Eric D. Madden*
Eric D. Madden (TX 24013079)
Richard H. Howell (*pro hac vice* forthcoming)
REID COLLINS & TSAI LLP
1445 Ross Avenue, Suite 2900
Dallas, Texas 75202
Telephone: (214) 420-8900
E-mail: emadden@reidcollins.com
rhowell@reidcollins.com

William T. Reid, IV (TX 00788817)
Joshua J. Bruckerhoff (TX 24059504)
Aaron A. Brown (*pro hac vice* forthcoming)
Seth W. Roye (*pro hac vice* forthcoming)
REID COLLINS & TSAI LLP
1301 S. Capital of Texas Hwy, Suite C-300
Austin, Texas 78746
Telephone: (512) 647-6100
E-mail: wreid@reidcollins.com
jbruckerhoff@reidcollins.com
abrown@reidcollins.com
sroye@reidcollins.com

Special Litigation Counsel to the Chapter 7 Trustee

/s/ *Peter A. Siddiqui*
Peter A. Siddiqui (*pro hac vice forthcoming*)
KATTEN MUCHIN ROSENMAN LLP
525 W. Monroe Street
Chicago, IL 60661
E-mail: peter.siddiqui@katten.com

Counsel for Ares Agent Services, L.P. and Ares Management LLC