Docket #1501 Date Filed: 11/17/2026

OKIN ADAMS BARTLETT CURRY LLP
Matthew S. Okin (TX Bar No. 00784695)
James W. Bartlett, Jr. (TX Bar No. 00795238)
Edward A. Clarkson, III (TX Bar No. 24059118)
1113 Vine St., Suite 240
Houston, Texas 77002
Telephone: 713.228.4100
Facsimile: 346.247.7158
mokin@okinadams.com
jbartlett@okinadams.com
eclarkson@okinadams.com
Counsel to Daniel Chu

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	Chapter 7
TRICOLOR HOLDINGS, LLC, *et al*.,	Case No. 25-33487 (MVL)
Debtors.[1]	(Jointly Administered)

NOTICE OF PRELIMINARY HEARING ON DANIEL CHU'S MOTION FOR ORDER AUTHORIZING THE USE OF PROCEEDS OF THE EXCESS DIRECTORS AND OFFICERS LIABILITY INSURANCE POLICY ISSUED BY OLD REPUBLIC INSURANCE COMPANY FOR ADVANCEMENT OF COVERED DEFENSE EXPENSES

PLEASE TAKE NOTICE that, on November 17, 2026, Daniel Chu ("***Mr. Chu***" or "***Movant***") filed *Daniel Chu's Motion for Order Authorizing the Use of Proceeds of the Excess*

[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 (collectively, the "Debtors").

25334872611170000000000002

Directors and Officers Liability Insurance Policy Issued by Old Republic Insurance Company for Advancement of Covered Defense Expenses [ECF No. 1500] (the "***Motion***").

PLEASE TAKE FURTHER NOTICE that a preliminary hearing on the Motion is set for **December 16, 2026, at 11:00 a.m. (Central Time)** (the "***Preliminary Hearing***"), before the Honorable Michelle V. Larson, United States Bankruptcy Judge. The Court has allotted a one-hour special setting for the Preliminary Hearing.

PLEASE TAKE FURTHER NOTICE that the Preliminary Hearing will be conducted by WebEx videoconference **only**. Parties may participate in the Preliminary Hearing by WebEx video using the following link: https://us-courts.webex.com/meet/larson (Meeting Number: 2301 476 1957). Parties who will not be seeking to introduce evidence may attend by WebEx telephone only by dialing 1.650.479.3207 and entering access code 2301 476 1957. A copy of the Court's WebEx Hearing Instructions for Judge Larson is attached hereto as **Exhibit 1** and is also available from Judge Larson's hearing/calendar page on the Court's website at https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-larson-hearing-dates.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy Rule 4001-1(b), a response to the Motion is required. Any response shall be in writing and filed with the Clerk of the United States Bankruptcy Court for the Northern District of Texas at the Earle Cabell Federal Building, 1100 Commerce Street, Room 1254, Dallas, Texas 75242-1496, before close of business on **December 4, 2026**. A copy shall be served upon counsel for Movant and any trustee or examiner appointed in the case. Any response shall include a detailed and comprehensive statement as to how Movant can be "adequately protected" if the stay is to be continued. If no response is timely filed, the allegations in the Motion may be deemed admitted, and an order granting the relief sought may be entered by default.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy Rule 4001-1(e)(1), evidence presented at the Preliminary Hearing will be by affidavit only. Movant shall serve its evidentiary affidavits at least seven days before the Preliminary Hearing, on or before **December 9, 2026**, and any responding party shall serve its evidentiary affidavits at least two days before the Preliminary Hearing, on or before **December 14, 2026**. Under Local Bankruptcy Rule 4001-1(e)(1), the failure of a respondent to file an evidentiary affidavit, or the failure of an attorney to attend the scheduled and noticed Preliminary Hearing, shall be grounds for granting the relief requested, regardless of the filing of a response to the Motion.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and its exhibits may be obtained through the Court's CM/ECF system or upon written request to the undersigned counsel.

[Remainder of page intentionally left blank]

Dated: November 17, 2026

Respectfully submitted,

OKIN ADAMS BARTLETT CURRY LLP

/s/ James W. Bartlett, Jr.
James W. Bartlett, Jr. (TX Bar No. 00795238)
1113 Vine St., Suite 240
Houston, Texas 77002
Telephone: 713.228.4100
Facsimile: 346.247.7158
Email: jbartlett@okinadams.com

Matthew S. Okin (TX Bar No. 00784695)
Edward A. Clarkson, III (TX Bar No. 24059118)
Email: mokin@okinadams.com
Email: eclarkson@okinadams.com

Counsel to Daniel Chu

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2026, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will cause a copy of the foregoing document to be served by the Court's ECF system upon parties who have registered with this Court; that on the same date I caused a copy of the foregoing document to be served by first-class United States mail, postage prepaid, upon the Debtors at the address shown on their petition, the Chapter 7 Trustee, Old Republic Insurance Company, the United States Attorney's Offices for the Northern District of Texas and the Southern District of New York, and the other parties listed on the attached Service List; and that on the same date I caused a copy of the foregoing document to be served by email upon counsel and representatives for the D&O Insurers.

/s/ James W. Bartlett, Jr.
James W. Bartlett, Jr.

Exhibit A

WebEx Hearing Instructions
Judge Michelle V. Larson

Pursuant to Clerk's Notice 2024-01 issued by the Court on May 14, 2024, certain hearings before Judge Michelle V. Larson will be conducted by WebEx videoconference.

For WebEx Video Participation/Attendance:

Link: https://us-courts.webex.com/meet/larson

Meeting Number: 23014761957

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1.650.479.3207
Access code: 2301 476 1957

Participation/Attendance Requirements:

- Counsel and other parties in interest who plan to actively participate in the hearing are encouraged to attend the hearing in the WebEx video mode using the WebEx video link above. Counsel and other parties in interest who will not be seeking to introduce any evidence at the hearing and who wish to attend the hearing in a telephonic only mode may attend the hearing in the WebEx telephonic only mode using the WebEx dial-in and meeting ID above.
- Attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. During hearings, participants are required to keep their lines on mute at all times that they are not addressing the Court or otherwise actively participating in the hearing. **The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings**. For general information and tips with respect to WebEx participation and attendance, please see Clerk's Notice 20-04: https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips_0.pdf
- **Unless the Court orders otherwise, witnesses are required to attend the hearing in the WebEx video mode and live testimony will only be accepted from witnesses who have the WebEx video function activated**. Telephonic testimony without accompanying video will not be accepted by the Court.
- All WebEx hearing attendees are required to comply with Judge Larson's Telephonic and Videoconference Hearing Policy (included within Judge Larson's Judge-Specific Guidelines): https://www.txnb.uscourts.gov/content/judge-michelle-v-larson-0

Exhibit Requirements:

- Any party intending to introduce documentary evidence at the hearing must file an exhibit list in the case prior to the hearing, with a true and correct copy of each designated exhibit filed as a separate, individual attachment thereto so that the Court and all participants have ready access to all designated exhibits.
- If the number of pages of such exhibits exceeds 100, then such party must also deliver two (2) sets of such exhibits in exhibit binders to the Court by no later than twenty-four (24) hours in advance of the hearing.

Notice of Hearing Content and Filing Requirements:

IMPORTANT: For all hearings that will be conducted by WebEx only:

- The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted by WebEx videoconference only, (2) provide notice of the above WebEx video participation/attendance link, and (3) attach a copy of these WebEx Hearing Instructions or provide notice that they may be obtained from Judge Larson's hearing/calendar site: https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-larson-hearing-dates

- When electronically filing the Notice of Hearing via CM/ECF select "at https://us-courts.webex.com/meet/larson" as the location of the hearing (note: this option appears immediately after the first set of Wichita Falls locations). Do not select Judge Larson's Dallas courtroom as the location for the hearing.

- **Notice to Members of the Public.** While the Judicial Conference of the United States relaxed its broadcasting policies during the COVID-19 Pandemic due to restrictions placed on in-person attendance at hearings and trials, these policies will expire and no longer be in effect after September 21, 2023. As a result, after September 21, 2023, remote ***video*** access to Court hearings shall ***only be available for case participants*** (parties-in-interest and their professionals) and non-case participants are not permitted to attend any hearing by remote *video* means. In certain circumstances, non-case participants may be permitted to attend proceedings by remote *audio* means, but only if no witness testimony is to be provided. The presiding judge may take any action deemed necessary or appropriate to address any unauthorized remote attendance at a hearing or trial. For the avoidance of doubt, members of the public will continue to generally be permitted to attend proceedings in person, in the courtroom.

SERVICE LIST

In re Tricolor Holdings, LLC, et al., Case No. 25-33487 (MVL) (Jointly Administered)

Daniel Chu's Motion for Order Authorizing the Use of Proceeds of the Excess Directors and Officers Liability Insurance Policy Issued by Old Republic Insurance Company for Advancement of Covered Defense Expenses

I. Via CM/ECF

All parties registered to receive electronic notice in these cases, including counsel for the Debtors, the Chapter 7 Trustee, the United States Trustee, and the United States of America.

II. Via First-Class United States Mail, Postage Prepaid

Tricolor Holdings, LLC, et al.
Debtors
6021 Connection Drive, 4th Floor
Irving, TX 75039

Anne Elizabeth Burns
Chapter 7 Trustee
900 Jackson Street, Suite 570
Dallas, TX 75202

Old Republic Insurance Company
Attn: President
631 Excel Drive, Suite 200
Mt. Pleasant, PA 15666

BMW Financial Services NA, LLC
c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

Secureclose
1225 W Main St Suite 101-601
Mesa, AZ 85201

Gary Lewis Polakoff, Trustee of the Gary and Diane Polakoff 2401 Trust
c/o Pinnacle Legal P.C.
9565 Waples Street, Suite 200
San Diego, CA 92121

United States Attorney's Office
Northern District of Texas
Attn: Civil-Process Clerk
1100 Commerce Street, Third Floor
Dallas, TX 75242-1699

United States Attorney's Office
Southern District of New York
Attn: Assistant United States Attorneys,
United States v. Chu, No. 25 Cr. 579 (PKC)
26 Federal Plaza, 37th Floor
New York, NY 10278