

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

BLITZ U.S.A., Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 11-13603 (PJW)

**Hearing Date: December 18, 2013 at 1:30 p.m.**  
**Objection Deadline: December 11, 2013 at 4:00 p.m.**

**Re: Docket Nos. 1921 & 1922**

**NOTICE OF HEARING TO CONSIDER  
THE ADEQUACY OF DISCLOSURE STATEMENT**

**PLEASE TAKE NOTICE THAT** on November 12, 2013, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee,” together with Debtors, the “Plan Proponents”) filed with the United States Bankruptcy Court for the District of Delaware the *Debtors’ and Official Committee of Unsecured Creditors’ Joint Plan of Liquidation* (the “Plan”) and the *Disclosure Statement for the Debtors’ and Official Committee of Unsecured Creditors’ Joint Plan of Liquidation* (the “Disclosure Statement”).

**PLEASE TAKE FURTHER NOTICE THAT** the Plan Proponents intend to present the Disclosure Statement, and any changes or modifications thereto, for approval at a hearing before the Honorable Peter J. Walsh on **December 18, 2013 at 1:30 p.m. (prevailing Eastern Time)** convened at the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 6<sup>th</sup> Floor, Courtroom No. 2, Wilmington, Delaware 19801 (the “Disclosure Statement Hearing”). The Disclosure Statement Hearing may be adjourned from time to time without further notice, except for the announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing(s).

**PLEASE TAKE FURTHER NOTICE THAT** objections, if any, to the approval of the Disclosure Statement must be in writing and must: (i) state the name and address of the objector or entity proposing a modification to the Disclosure Statement and the amount of its claim or nature of its interest in the Debtors’ chapter 11 cases; (ii) specify the basis and the nature of any objection and set forth the proposed modification to the Disclosure Statement, together with suggested language; (iii) be filed with the clerk of the Bankruptcy, 824 N. Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 together with proof of service, **on or before 4:00 p.m.**

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: LAM 2011 Holdings (8742); Blitz Acquisition Holdings, Inc. (8825); Blitz Acquisition, LLC (8979); Blitz RE Holdings, LLC (9071); Blitz U.S.A., Inc. (8104); and MiamiOK LLC (2604). The location of the Debtors’ corporate headquarters and the Debtors’ service address is 309 North Main Street, Miami, OK 74354.



**(prevailing Eastern Time) on December 11, 2013** (the “Objection Deadline”); and (iv) be served upon counsel below so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** copies of the Plan and the Disclosure Statement may be obtained by parties in interest free of charge at [www.kcellc.net/Blitz](http://www.kcellc.net/Blitz) or by contacting Kurtzman Carson Consultants, LLC at (877) 606-7519. Copies of the Plan and Disclosure Statement also are available for inspection during regular business hours at the office of the clerk of the Bankruptcy Court, 3<sup>rd</sup> Floor, 824 N. Market Street, Wilmington, Delaware 19801. In addition, copies of the Plan and Disclosure Statement may be obtained from counsel to the Proponents by request to: (1) counsel to Blitz U.S.A., Inc., Blitz RE Holdings, LLC, MiamiOK LLC, and Blitz Acquisition, LLC, Richards, Layton & Finger, P.A., One Rodney Square, 920 N. King Street, Wilmington, Delaware 19801 (Attn: Daniel J. DeFranceschi, Michael J. Merchant and Marcos A. Ramos); (2) counsel to LAM 2011 Holdings, LLC and Blitz Acquisition Holdings, Inc., Young, Conaway, Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Sean M. Beach and Justin P. Duda) and (3) counsel to the Official Committee of Unsecured Creditors, Lowenstein Sandler LLP, 65 Livingston Avenue, Roseland, NJ 07068 (Attn: Jeffrey D. Prol and Mary E. Seymour) and Womble Carlyle Sandridge & Rice, LLP, 222 Delaware Avenue, Suite 1501, Wilmington, DE 19801 (Attn: Francis A. Monaco, Jr. and Kevin Mangan) or viewed on the Internet at the Bankruptcy Court’s website (<http://www.deb.uscourts.gov>) by following the directions for accessing the ECF system on such website.

Dated: November 12, 2013

/s/ Amanda R. Steele

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