

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

BLITZ U.S.A., Inc., et al.,

Debtors.

Chapter 11

Case No. Case No. 11-13603 (PJW)

(Jointly Administered)

Re: Docket No. 2007 and 2152

**BAUMAN CLAIMANTS' EMERGENCY MOTION FOR PRELIMINARY INJUNCTION:
a) STAYING DISTRIBUTION OF BLITZ PERSONAL INJURY TRUST ASSETS; b)
REMOVAL OF THE TRUSTEE AND THE TAC; AND c) COURT SUPERVISION OF THE
TRUST DISTRIBUTION PROCESS**

Pursuant to Federal Rule of Bankruptcy Procedure 7065 and Fed. R. Civ. P. 65(b), Creditors/Claimants, Michael Bauman, Jr., Michael Bauman, Sr., and Donna (Bauman) Greer (collectively, the "Bauman Claimants") hereby move the Court to enter a preliminary injunction staying payment by the Trustee of any funds from the Blitz Personal Injury Trust, including but not limited to the Special Circumstances Fund, created by Blitz Personal Injury Trust Distribution Procedures because the claims evaluation and distribution process has been tainted by fraud, breaches of fiduciary duties and administration by the Trustee in contravention of the plain language of the Court-approved Plan. The Bauman Claimants tender the attached memoranda (with personal identification information of minors redacted) in support of their motion. An unredacted version of the memoranda will be provided to the Court via United States Mail.

Respectfully submitted,

JONES WARD PLC
Lawrence L. Jones II (*Admitted Pro Hac Vice*)

/s/ Lawrence L. Jones II
Marion E. Taylor Building
312 South Fourth Street, Sixth Floor
Louisville, Kentucky 40202
Phone: (502) 882-6000
Fax: (502) 587-2007
E-mail: larry@jonesward.com
Counsel for the Bauman Claimants



and

Xiaojuan Carrie Huang
3513 Concord Pike
Suite 3100
Wilmington, Delaware 19803
Phone: (302) 478-2900
Fax: (302) 613-2528
Email: huang@xhlegal.com
Local Counsel for the Bauman Claimants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all interested parties of record have been served via electronic mail, first-class United States Mail, postage prepaid, and the Court's ECF/CM system upon the filing of this pleading.

/s/ Lawrence L. Jones II
Counsel for the Bauman Claimants