Case 11-13603-CSS Doc 2446 Filed 06/00/15

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	CHAPTER 11
BLITZ U.S.A., Inc., $et al.$, ¹)	Case No. 11-13603 (CSS)
Debtors.)	Jointly Administered
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,)	
v.)	
American Express, Defendant.))	Adv. No. 13-52481 (CSS)
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,)	
v.)	
Booth & Booth Electric, Defendant.))	Adv. No. 14-50373 (CSS)
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,)	
v.)	
Lockton Companies, LLC, Defendant.)	Adv. No. 13-52478 (CSS)
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,)	
v.)	
Miami Public Utilities, Defendant.)))	Adv. No. 13-52465 (CSS)
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,)	
v.)	$A_{\rm dy}$ No. 12 52400 (CSS)
Neece Concrete Construction, Defendant.)	Adv. No. 13-52490 (CSS)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: LAM 2011 Holdings, LLC (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.



The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,))
v.)
Ozark Crane Service, Inc., Defendant.) Adv. No. 13-52468 (CSS)
The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., <i>et al.</i> , Plaintiff,))
V.)
Portable Fuel Container Manufacturers Associations, Defendant.) Adv. No. 13-52469 (CSS))

STATUS REPORT

Pursuant to paragraph 11 of the Scheduling Order entered by the Court on March

10, 2015, The Blitz Liquidating Trust, as successor in interest to Blitz U.S.A., Inc., Plaintiff in

the above-captioned adversary proceedings ("Blitz"), by and through its undersigned counsel,

hereby submits the following Status Report regarding the above-captioned adversary

proceedings:

Adversary Proceeding	Status
Blitz v. American Express Adv. No. 13-52481	Status F - Answer to Complaint filed on January 15, 2015; Plaintiff and Defendant have exchanged Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Blitz v. Booth & Booth Electric Adv. No. 14-50373	Status F - Answer to Complaint filed on July 8, 2014; Plaintiff has served Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Blitz v. Lockton Companies, LLC Adv. No. 13-52478	Status F - Answer to Complaint filed on April 16, 2015; Plaintiff and Defendant have exchanged Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Blitz v. Miami Public Utilities Adv. No. 13-52465	Status E – This case has been settled and once the settlement agreement has been fully consummated, the

	parties intend to file a Stipulation of Dismissal.
Blitz v. Neece Concrete Construction Adv. No. 13-52490	Status F - Answer to Complaint filed on July 9, 2014; Plaintiff has served Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Blitz v. Ozark Crane Service, Inc. Adv. No. 13-52468	Status F - Answer to Complaint filed on March 10, 2015; Plaintiff and Defendant have exchanged Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Blitz v. Portable Fuel Container Manufacturers Associations Adv. No. 13-52469	Status F - Answer to Complaint filed on July 9, 2014; Plaintiff and Defendant have exchanged Initial Disclosures pursuant to Fed.R.Civ.P.26(a)(1); Discovery has commenced.
Dated: June 8, 2015 Wilmington, Delaware	WOMBLE CARLYLE SANDRIDGE & RICE, LLP
	By: <u>/s/ Kevin J. Mangan</u> Francis A. Monaco, Jr., Esq. (No. 2078) Kevin J. Mangan, Esq. (No. 3810) Thomas M. Horan (No. 4641) 222 Delaware Avenue, Suite 1501 Wilmington, DE 19801 Telephone: 302-252-4320 Facsimile: 302-252-4330
	-and-
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	Counsel to the Blitz Liquidating Trustee on behalf of the Blitz Liquidating Trust
	J

ELLIOTT GREENLEAF

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Conflicts Counsel to Blitz Acquisition, LLC, Blitz RE Holdings, LLC, Blitz U.S.A., Inc., and MiamiOK LLC (f/k/a F3 Brands LLC) solely with regard to the adversary proceedings against the following defendants: American Express; Lockton Companies, LLC

CERTIFICATE OF SERVICE

I, Judith B.Wray, certify that I am not less than 18 years of age, and that on June 8, 2015, the foregoing document was served upon the parties listed below *via* U.S. First Class mail postage prepaid.

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Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: June 8, 2015

/s/ Judith B. Wray Judith B. Wray