Case 11-13603-CSS FILA 07/00/1F Doc 2117

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. Neece Concrete Construction, Defendant.)) Adv. No. 13-52490 (CSS))
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))

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., *et al.*, Plaintiff, v. Portable Fuel Container Manufacturers

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:

Associations, Defendant.

Adversary Proceeding	Status
Blitz v. American Express Adv. No. 13-52481	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. Booth & Booth Electric Adv. No. 14-50373	Status G – A mediator has been appointed and mediation is to be scheduled.
Blitz v. Lockton Companies, LLC Adv. No. 13-52478	Status F – Discovery has commenced.
Blitz v. Neece Concrete Construction Adv. No. 13-52490	Status G – A mediator has been appointed and mediation is to be scheduled.
Blitz v. Ozark Crane Service, Inc. Adv. No. 13-52468	Status G – A mediator has been appointed and mediation is to be scheduled.
Blitz v. Portable Fuel Container Manufacturers Associations Adv. No. 13-52469	Status G – A mediator has been appointed and mediation is to be scheduled.

Dated: July 23, 2015 Wilmington, Delaware

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

By: <u>/s/ Kevin J. Mangan</u>

Francis A. Monaco, Jr., Esq. (DE No. 2078) Kevin J. Mangan, Esq. (DE No. 3810) Thomas M. Horan (DE No. 4641) 222 Delaware Avenue, Suite 1501 Wilmington, DE 19801 Telephone: 302-252-4320 Facsimile: 302-252-4330

-and-

LOWENSTEIN SANDLER PC

Jeffrey D. Prol, Esq. Mary E. Seymour, Esq. 65 Livingston Avenue Roseland, New Jersey 07068 (973) 597-2500 (Telephone) (973) 597-2400 (Facsimile)

Counsel to the Blitz Liquidating Trustee on behalf of the Blitz Liquidating Trust

-and-

ELLIOTT GREENLEAF

Rafael X. Zahralddin-Aravena (DE No. 4166) Eric M. Sutty (DE No. 4007) Jonathan M. Stemerman (DE No. 4510) The I.M. Pei Building 1105 North Market Street, Suite 1700 Wilmington, DE 19801 Telephone: (302) 384-9405 Facsimile: (302) 384-9399 E-mail: rxza@elliottgreenleaf.com E-mail: ems@elliottgreenleaf.com

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 July 23, 2015 the foregoing document was served upon the parties listed below *via* U.S. First Class mail postage prepaid.

Michael Holbein, Esq.	Gregory W. Hauswirth, Esq.
Arnall Golden Gregory LLP	Leech Tishman Fuscaldo & Lampl, LLC
171 17th Street NW, Suite 2100	1105 N. Market St., Ste. 1050
Atlanta, GA 30363	Wilmington DE 19801
Kathleen M. Miller, Esq.	Matthew Lichtenstein, Esq.
Smith, Katzenstein & Jenkins LLP	Leech Tishman Fuscaldo & Lampl, LLC
800 Delaware Avenue	525 William Penn Place, 28th Floor
P.O. Box 410	Pittsburgh, PA 15219
Wilmington, DE 19899	
Brian M. Holland, Esq.	Norman E. Rouse, Esq.
Lathrop & Gage LLP	Collins Webster and Rouse
2345 Grand Blvd., Suite 2800	5957 E. 20th Street
Kansas City, MO 64108	Joplin, MO 64801
Dennis A. Meloro, Esq.	
Greenberg Traurig	
The Nemours Building	
1007 North Orange Street, Suite 1200	
Wilmington, DE 19801	
Greenberg Traurig The Nemours Building 1007 North Orange Street, Suite 1200	

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

Dated: July 23, 2015

<u>/s/ Judith B. Wray</u> Judith B. Wray