

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

In re:	)	CHAPTER 11
	)	
BLITZ U.S.A., Inc., <i>et al.</i> , <sup>1</sup>	)	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)
	)	

<sup>1</sup> 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.



1113603150904000000000001

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

### **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:

<b>Adversary Proceeding</b>	<b>Status</b>
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 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. Lockton Companies, LLC Adv. No. 13-52478	Status F – Discovery has commenced.
Blitz v. Neece Concrete Construction Adv. No. 13-52490	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. Ozark Crane Service, Inc. Adv. No. 13-52468	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. Portable Fuel Container Manufacturers Associations Adv. No. 13-52469	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.

Dated: September 4, 2015  
Wilmington, Delaware

**WOMBLE CARLYLE SANDRIDGE  
& RICE, LLP**

By: /s/ Kevin J. Mangan

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. Suttty (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

E-mail: jms@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, Kevin J. Mangan, certify that I am not less than 18 years of age, and that on September 4, 2015 the foregoing document was served upon the parties listed below *via* U.S. First Class mail postage prepaid.

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

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

Dated: September 4, 2015

/s/ Kevin J. Mangan  
Kevin J. Mangan (DE Bar No. 3810)