

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

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



111360316012100000000001

| | | |
|--|---|-------------------------|
| 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:

| 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 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 E – Pursuant to the mediation conference held on November 17, 2015, this matter has been completely resolved and counsel will file a stipulation and proposed order once the agreement has been fully consummated. |
| 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: January 21, 2016
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 January 21, 2016 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 | |

Dated: January 21, 2016

/s/ Kevin J. Mangan

Kevin J. Mangan (DE Bar No. 3810)