

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
BLITZ U.S.A., Inc., *et al.*,<sup>1</sup> ) Case No. 11-13603 (CSS)  
)  
Debtors. ) Jointly Administered  
)  
) Related Docket No.: 2515  
)  
) Hearing Date: April 14, 2021 at 11:45 a.m. (ET)  
\_\_\_\_\_ )

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE LIQUIDATING  
TRUSTEE TO FURTHER EXTEND THE BLITZ LIQUIDATING TRUST**

The undersigned hereby certifies that, as of the date hereof, the undersigned has received no answer, objection, or other responsive pleading to the relief requested pursuant to the *Motion of the Liquidating Trustee to Further Extend the Blitz Liquidating Trust* [Docket No. 2515] (the “Motion”), filed on March 4, 2021. Pursuant to the notice appended to the Motion, responses or objections to the Motion were due on or before March 18, 2021 at 4:00 p.m. (Eastern Time). The undersigned certifies that the Court’s docket in these cases reflects that no answer, objection, or other responsive pleading to the Motion has been filed.

The undersigned respectfully submits that the proposed order annexed to the Motion, and attached hereto as Exhibit A, may be entered by the Court without further notice or hearing.

<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.



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Dated March 19, 2021  
Wilmington, Delaware

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on behalf of the Blitz Liquidating Trust*

**EXHIBIT A**

**Proposed Order**

**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
	)	
	)	Related Docket Nos.: 2515, _____

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**ORDER EXTENDING THE TERM OF THE BLITZ LIQUIDATING TRUST**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the Liquidating Trustee for entry of an order, pursuant to Bankruptcy Code section 105(a), further extending the term of the Blitz Liquidating Trust for a period of one (1) year and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of this Motion having been given; and it appearing that no other or further notice need be provided; and it appearing that the relief requested is in the best interest of the Debtors and their estates; and after due deliberation thereon, and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The term of Blitz Liquidating Trust is hereby extended for a period of one (1) year, through and including March 20, 2022.
3. This order is entered without prejudice to the Liquidating Trustee’s ability to seek further extensions of the Blitz Liquidating Trust’s term.

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<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.

<sup>2</sup> Capitalized terms used herein, but not defined herein, shall have the meanings ascribed to such terms in the Motion.

4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.