

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. 2558  
) Hearing Date: April 10, 2023 at 10:00 a.m. (ET)

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**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE LIQUIDATING  
TRUSTEE FOR ENTRY OF AN ORDER (I) CLOSING THE CHAPTER 11 CASES, (II)  
DIRECTING ENTRY OF A FINAL DECREE, AND (III) GRANTING RELATED RELIEF**

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 for Entry of an Order (I) Closing the Chapter 11 Cases, (II) Directing Entry of a Final Decree, and (III) Granting Related Relief* [Docket No. 2558] (the “Motion”), filed on March 6, 2023. Pursuant to the notice appended to the Motion, responses or objections to the Motion were due on or before April 3, 2023 at 4:00 p.m. (prevailing 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.

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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.



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Dated April 4, 2023  
Wilmington, Delaware

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Kevin J. Mangan

Kevin J. Mangan, Esq. (No. 3810)  
Ericka F. Johnson, Esq. (No. 5024)  
1313 N. Market Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 252-4320  
Facsimile: (302) 252-4330  
Email: kevin.mangan@wbd-us.com  
Email: ericka.johnson@wbd-us.com

-and-

**LOWENSTEIN SANDLER LLP**

Jeffrey D. Prol, Esq.  
Michael Papandrea, Esq.  
65 Livingston Avenue  
Roseland, New Jersey 07068  
Telephone: (973) 597-2500  
Facsimile: (973) 597-2400  
Email: jprol@lowenstein.com  
Email: mpapandrea@lowenstein.com

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

WBD (US) 61159771v1

**EXHIBIT A**

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

In re:

BLITZ U.S.A, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 11-13603 (CTG)

Jointly Administered

Re: Docket No. 2558

**ORDER (I) CLOSING THE CHAPTER 11 CASES, (II) DIRECTING ENTRY OF A  
FINAL DECREE, AND (III) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the Liquidating Trustee for entry of an order, pursuant to sections 105(a), 350(a), and 554 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2002-1(f) and 3022-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), (i) closing the open Chapter 11 Cases of Debtors Blitz U.S.A., Inc. (Case No. 11-13603), MiamiOK LLC (Case No. 11-13604), Blitz Acquisition, LLC (Case No. 11-13606) and Blitz RE Holdings, LLC (Case No. 11-13607) (collectively, the “Remaining Chapter 11 Cases”), (ii) directing the entry of a final decree, and (iii) granting related relief; and it appearing that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and (c) notice of the Motion was due and proper under the circumstances; the Court having considered the Motion and any responses to the Motion; it appearing that the relief requested in the Motion is appropriate; and upon the record herein and after due deliberation, and good and sufficient cause appearing therefor; it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

<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, Inc. (8742); Blitz Acquisition Holdings, Inc. (8825); Blitz Acquisition, LLC (8979); Blitz RE Holdings, LLC (8742); Blitz U.S.A., Inc. (8104); and MiamiOK LLC (2604).

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

2. The Remaining Chapter 11 Cases of Blitz U.S.A., Inc. (Case No. 11-13603), MiamiOK LLC (Case No. 11-13604), Blitz Acquisition, LLC (Case No. 11-13606) and Blitz RE Holdings, LLC (Case No. 11-13607) are hereby **CLOSED** effective immediately as of the entry of this Order.

3. The Clerk of the Court shall issue a Final Decree closing the Chapter 11 Cases.

4. Upon the entry of this Order, the Liquidating Trustee shall: (i) submit post-confirmation quarterly report(s) for the Remaining Chapter 11 Cases for the reporting period ending as of the date of this Order, and (ii) pay all quarterly fees due to the United States Trustee under 28 U.S.C. § 1930 (“U.S. Trustee Quarterly Fees”) that have come due as of the date hereof. The U.S. Trustee reserves the right to move to reopen the Remaining Chapter 11 Cases in the event that such post-confirmation quarterly reports are not submitted and all U.S. Trustee Quarterly Fees are not paid on a timely basis.

5. Following the completion of the services identified in paragraphs 6 and 7 below, the Claims Agent (Kurtzman Carson Consultants LLC) shall have no further obligations to this Court or any party in interest with respect to the claims and noticing services in these Chapter 11 Cases.

6. Within twenty-eight (28) days following entry of this Order, the Claims Agent shall deliver to the Clerk an electronic copy in pdf format of all proofs of claim filed in the Chapter 11 Cases. Once the electronic copy has been received by the Clerk, the Claims Agent may destroy all proofs of claim in its possession sixty (60) days after filing a Notice of Intent to Destroy on the Court’s docket. The Claims Agent may also terminate its website related to the Chapter 11 Cases upon entry of this Order.

7. The Claims Agent will collect any mail regarding the Chapter 11 Cases that is received after the entry of this Order and, as soon as reasonably practicable, forward such mail to the Liquidating Trustee, provided that the Claims Agent shall be reasonably compensated and reimbursed for its reasonable and documented expenses in connection with any such mail forwarding services provided by the Claims Agent after the of entry of this Order. Notwithstanding

the foregoing, neither the Liquidating Trustee nor the Claims Agent shall be required to retain, respond to, or otherwise address any mail received after the entry of this Order, and the Liquidating Trustee shall have the right to terminate the mail-forward services described herein at any time in the Liquidating Trustee's sole discretion.

8. The Liquidating Trustee is authorized, but not required, to immediately abandon and/or destroy any Books and Records in the possession of the Blitz Liquidating Trust (and its respective agents, employees, contractors, and professionals) in the Liquidating Trustee's sole discretion.

9. The Liquidating Trustee and his agents are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order. Without limitation, the Liquidating Trustee and his agents are authorized to file required tax returns, make final distribution(s), address unclaimed distributions, and carry out other ministerial tasks as may be required under the Plan and related documents. At the conclusion of such actions, the Liquidating Trustee is discharged and released from any obligations in the Chapter 11 Cases without further notice to or intervention of the Court.

10. Notwithstanding anything in the Bankruptcy Code, Bankruptcy Rules, or Local Rules to the contrary, this Order shall be immediately effective upon its entry, there shall be no stay of execution or effectiveness of this Order, and this Order shall be a final order.

11. This Court shall retain sole and exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.