

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Body Contour Ventures, LLC,¹

Debtors.

Chapter 11

Case No. 19-42510-pjs

Hon. Phillip J. Shefferly

**DEBTORS' EX-PARTE MOTION TO AUTHORIZE OMNIBUS REPLY
BRIEF IN EXCESS OF E.D. MICH. LBR 9014-1(f) PAGE LIMITATION**

Debtors, through counsel, for their *Ex-Parte Motion To Authorize
Omnibus Reply Brief In Excess Of E.D. Mich. LBR 9014(f) Page Limitation*
state:

¹ Debtors cases are being jointly administered for procedural purposes only and include Debtors Body Contour Ventures, LLC, Case No. 19-42510, BCA Acquisitions, LLC, Case No. 19-42511, American Aesthetic Equipment, LLC, Case No. 19-42512, Knoxville Laser Spa LLC, Case No. 19-42513, LRX Alexandria, LLC, Case No. 19-42514, LRX Birmingham, LLC, Case No. 19-42515, LRX Charlotte, LLC, Case No. 19-42516, LRX Chicago, LLC, Case No. 19-42517, LRX Colorado Springs, LLC, Case No. 19-42518, LRX Dearborn, LLC, Case No. 19-42519, LRX East Lansing, LLC, Case No. 19-42520, LRX Grand Blanc, LLC, Case No. 19-42833, LRX Hoffman Estates, LLC, Case No. 19-42521, LRX Las Vegas Summerlin, LLC, Case No. 19-42522, LRX Mesa, LLC, Case No. 19-42523, LRX Naperville, LLC, Case No. 19-42524, LRX Novi, LLC, Case No. 19-42525, LRX Orland Park, LLC, Case No. 19-42526, LRX Plymouth-Canton, LLC, Case No. 19-42527, LRX Stone Oak, LLC, Case No. 19-42528, LRX Towson, LLC, Case No. 19-42530, LRX Troy, LLC, Case No. 19-42531, Premier Laser Spa of Greenville LLC, Case No. 19-42532, Premier Laser Spa of Indianapolis LLC, Case No. 19-42533, Premier Laser Spa of Louisville LLC, Case No. 19-42534, Premier Laser Spa of Pittsburgh LLC, Case No. 19-42535, Premier Laser Spa of St. Louis LLC, Case No. 19-42536, and Premier Laser Spa of Virginia LLC, Case No. 19-42537.

1. The objection deadline related to Debtors' pending Sale Motion was May 17, 2019 at 5:00 pm ET. [Docket No. 405].

2. As of the objection deadline, there were 14 objections that were filed (one landlord creditor filed two objections).

3. Debtors' deadline to submit a reply brief in support of the Sale Motion is May 20, 2019 at 5:00 pm. [Docket No. 405].

4. Reply briefs are limited to seven pages under E.D. Mich. LBR 9014-1(f).

5. Debtors intend to file one omnibus reply to address all objections.

6. The above-referenced 14 objections contain numerous factual allegations and legal issues.

7. In order to meaningfully address the arguments raised in the objections, Debtors request entry of an order permitting Debtors to exceed the page limitation of E.D. Mich. LBR 9014-1(f).

WHEREFORE, Debtors respectfully request that the Court enter an order in the form attached as Exhibit 1.

Respectfully submitted,

WOLFSON BOLTON PLLC

Dated: May 19, 2019

By: /s/ Anthony J. Kochis
Scott A. Wolfson (P53194)
Anthony J. Kochis (P72020)
Thomas J. Kelly (P78754)
3150 Livernois, Suite 275
Troy, MI 48083
Telephone: (248) 247-7105
Facsimile: (248) 247-7099
Email: akochis@wolfsonbolton.com