UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: Chapter 11

Body Contour Ventures, LLC,¹ Case No. 19-42510-pjs

Debtors. 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:

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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).
- 8. Debtors request permission to file an Omnibus Reply not to exceed 30 pages.

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

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Respectfully submitted,

WOLFSON BOLTON PLLC

Dated: May 20, 2019 By: /s/ Anthony J. Kochis

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