

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

In re:

Body Contour Ventures, LLC,

Debtor.

Chapter 11

Case No. 19-42510

Hon. Phillip J. Shefferly

**EX-PARTE MOTION FOR SHORTENED NOTICE AND EXPEDITED
HEARING REGARDING DEBTOR'S EMERGENCY MOTION TO
ENFORCE THE AUTOMATIC STAY AND COMPEL BANK OF AMERICA
TO REOPEN BANK ACCOUNTS**

Debtors and Debtors-In-Possession identified below (collectively,
“Debtors”),¹ through proposed counsel, Wolfson Bolton PLLC, for their *Ex-*

¹ This Motion is being filed on behalf of 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. 19-30413, 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.

*Parte Motion for Shortened Notice and Expedited Hearing regarding
Emergency Motion To Enforce The Automatic Stay And Compel Bank Of
America To Reopen Accounts (“Motion”) state:*

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding under 28 U.S.C. § 157(b).
3. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

REQUESTED RELIEF AND BASIS FOR RELIEF

4. As set forth in the Motion, Bank of America has inexplicably closed Debtors’ bank accounts in violation of the automatic stay.
5. Debtors cannot operate their businesses absent access to their bank accounts.
6. Due to the emergency nature of this matter, Debtors request that the Court grant the Motion on an interim basis to at least preserve the status quo and prevent irreparable injury to Debtors’ business and further set an expedited hearing and response date whereby Bank of America may respond and appear at a hearing to explain why it has taken this drastic

action and why it has refused to re-open Debtors' bank accounts despite having knowledge of Debtors' bankruptcy filings.

7. As set forth in the Motion, numerous attempts to resolve this matter with Bank of America were made before filing the Motion.

8. Local Rule 9006-1(b) permits the Court to reduce or enlarge the time for a party to take any action or file any paper.

9. A proposed order is attached as Exhibit 1.

WHEREFORE, Debtors request that the Court grant the Motion and award Debtors such further relief as the Court may deem proper.

Respectfully submitted,

WOLFSON BOLTON PLLC

Dated: February 27, 2019

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