

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
PERFECT BROW ART, INC.	)	Case No. 19-_____
	)	
Debtor.	)	Honorable _____
In re:	)	Chapter 11
	)	
PERFECT BROW FLORIDA, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
PERFECT BROW PUERTO RICO, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
PERFECT BROW NEW YORK, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
LOCKS ROCK, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
P.B. ART FRANCHISE, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
PERFECT BROW OAKLAND, INC.	)	Case No. 19-_____
	)	
Debtor.	)	
In re:	)	Chapter 11
	)	
OOH LA LA FRANCHISE BEAUTY BAR, INC.	)	Case No. 19-_____
	)	
Debtor.	)	

**DEBTORS' MOTION TO DIRECT JOINT ADMINISTRATION  
OF RELATED CHAPTER 11 CASES**

Perfect Brow Art, Inc., Perfect Brow Florida, Inc., Perfect Brow Puerto Rico, Inc., Perfect Brow New York, Inc., Perfect Brow Oakland, Inc., Ooh La La Franchise Beauty Bar, Inc., Locks Rock, Inc, and P.B. Art Franchise, Inc. (collectively, the “*Debtors*”), debtors and debtors-in-possession in the above captioned chapter 11 cases (the “*Chapter 11 Cases*”) hereby files this motion (the “*Motion*”) for entry of an order, pursuant to section 105 of title 11 of the United States Code (the “*Bankruptcy Code*”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Illinois (the “*Local Rules*”), granting joint administration of the Chapter 11 Cases. In support of this Motion, the Debtors respectfully state as follows:

**Jurisdiction and Venue**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue of these cases and this Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**Background**

3. On January 22, 2019 (the “*Petition Date*”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “*Chapter 11 Cases*”) in the United States Bankruptcy Court for the Northern District of Illinois (the “*Court*”). The Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these chapter 11 cases.

4. The factual background relating to the Debtors' commencement of these chapter 11 cases is set forth in detail in the *Declaration of Elizabeth Porikos-Gorgees in Support of Debtors' Chapter 11 Petitions and First Day Motions* filed on the Petition Date and incorporated herein by reference.

**Relief Requested and Basis for Relief**

5. In order to optimally and economically administer the Chapter 11 Cases, such cases should be jointly administered for procedural purposes only, under case number assigned to Perfect Brow Art, Inc. (Case No. 19-01811). Pursuant to Bankruptcy Rule 1015(b), "[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b). The Debtors are all "affiliates" as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Court is authorized to grant the relief requested herein.

6. Joint administration will save time and costs and avoid duplicative and potentially confusing filings by permitting parties in interest to: (a) use a single caption on all documents that will be served in the Debtors' chapter 11 cases; and (b) file pleadings in one case rather than multiple cases. Joint administration will also protect parties in interest by ensuring that the parties in each of the Debtors' respective chapter 11 cases will be apprised of the various matters before the Court in each case. Joint administration will thus ease the administrative burden for the Court and all parties in interest.

7. Joint administration will not adversely affect creditors' rights because this Motion requests only the administrative consolidation, and not the substantive consolidation, of the Debtors' estates. As such, each creditor will continue to hold its claim against a particular Debtor's

estate after this Motion is approved. Accordingly, the Debtors respectfully request that the Court modify the captions of these chapter 11 cases to reflect joint administration as follows:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	
	)	Chapter 11
	)	
PERFECT BROW ART, INC., <i>et al.</i>	)	Case No. 19-01811
	)	(Jointly Administered)
	)	
Debtors. <sup>1</sup>	)	Honorable Donald R. Cassling
	)	

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8. The Debtors also seek the Court's direction that a notation substantially similar to the following be entered on the docket in each of the above-captioned cases, other than Perfect Brow Art, Inc., to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Perfect Brow Florida, Inc., Perfect Brow Puerto Rico, Inc., Perfect Brow New York, Inc., Perfect Brow Oakland, Inc., Ooh La La Franchise Beauty Bar, Inc., Locks Rock, Inc., and P.B. Art Franchise, Inc. The docket in Perfect Brow Art, Inc., Case No. 19-01811 should be consulted for all matters affecting this case.

9. Based on the foregoing, the relief requested herein is necessary and appropriate, is in the best interests of the Debtors' estates and creditors, and should be granted in all respects.

**Notice**

10. Notice of this Motion will be provided to (i) the Office of the United States Trustee; (ii) the holders of the twenty (20) largest unsecured claims against each of the Debtors; (iii) entities

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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 taxpayer-identification number, are: (i) Perfect Brow Art, Inc. (5731); (ii) Perfect Brow Florida, Inc. (5602), (iii) Perfect Brow Puerto Rico, Inc. (3497), (iv) Perfect Brow New York, Inc. (2041), (v) Locks Rock, Inc. (5046), (vi) P.B. Art Franchise, Inc. (0026), (vii) Perfect Brow Oakland, Inc. (5727), and (viii) Ooh La La Franchise Beauty Bar, Inc. (0714).

that have filed UCC-1 financing statements against the Debtors; and (iv) all other parties requesting notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors submit that no further notice is required.

WHEREFORE, the Debtors respectfully request this Court enter an order: (i) directing the joint administration of the Debtors' chapter 11 cases; and (ii) granting any other relief as the court deems just and proper.

Respectfully submitted,

Dated: January 23, 2019

**PERFECT BROW ART, INC., *ET AL.***

By: /s/ Harold D. Israel

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*Proposed attorneys for the Debtors*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division

In Re:	)	BK No.: 19-01811
	)	
Perfect Brow Art, Inc. et al.	)	Chapter: 11
	)	Honorable Donald R. Cassling
	)	
Debtor(s)	)	

**ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Upon the motion of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) seeking an order of this Court directing joint administration of the Debtors’ chapter 11 cases for procedural purposes only; the Court finding that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) notice of the Motion and the hearing on the Motion was sufficient under the circumstances; (iv) the relief requested in the Motion is warranted, will ease the administrative burden for the Court and parties in interest in these cases, protects the creditors of the different estates and is in the best interests of the Debtors, their estates, and their creditors; and (v) upon the record herein; and after due deliberation thereon, good and sufficient cause exists for the granting of relief as set forth herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is Granted;
2. The above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by the Court.
3. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the Debtors' chapter 11 cases.
4. The caption of the jointly administered cases shall read as set forth in the Motion.
5. An entry that reads as follows shall be made on the docket of each case that is not the lead case to reflect the joint administration of the chapter 11 cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Perfect Brow Florida, Inc., Perfect Brow Puerto Rico, Inc., Perfect Brow New York, Inc., Perfect Brow Oakland, Inc., Ooh La La Franchise Beauty Bar, Inc., Locks Rock, Inc., and P.B. Art Franchise, Inc. The docket in Perfect Brow Art, Inc., Case No. 19-01811 should be consulted for all matters affecting this case.

6. The terms and conditions of this Order are enforceable immediately upon its entry.
7. The Court retains jurisdiction and determine all matters arising from the entry of this Order.

Enter:

Dated:

Honorable Donald R. Cassling  
United States Bankruptcy Judge

**Prepared by:**

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