

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	Chapter 11
)	
PERFECT BROW ART INC., <i>et al.</i>)	Case No. 19-1811
)	(Joint Administration Requested)
)	
Debtors. ¹)	Honorable Donald R. Cassling
)	

**DEBTORS' MOTION FOR AN ORDER (I) EXTENDING TIME TO FILE SCHEDULES
OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS;
AND (II) GRANTING RELATED RELIEF**

Perfect Brow Art, Inc. and its debtor affiliates, as debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “*Debtors*”), file this motion (the “*Motion*”), pursuant to sections 105(a) and 521(a) of title 11 of the United States Code (the “*Bankruptcy Code*”), and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), for entry of an order (i) extending the initial fourteen (14) day period to file their schedules of assets and liabilities and statements of financial affairs (collectively, the “*Schedules and Statements*”) to the forty-fifth (45th) day after the Petition Date (the “*Deadline*”), without prejudice to the Debtors’ right to request additional time if necessary; and (ii) granting related relief. In support of this Motion, the Debtors respectfully state as follows:

¹ 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).

Jurisdiction and Venue

1. The Court has jurisdiction to consider 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. Section 521 of the Bankruptcy Code requires a debtor to file schedules of assets and liabilities and statements of financial affairs (the “*Schedules and Statements*”) unless the Court orders otherwise. *See* 11 U.S.C. § 521(a)(1)(A)–(B). These Schedules and Statements must be filed within fourteen (14) days after the petition date unless the Court grants an extension of time “on motion for cause shown and on notice to the United States Trustee, any committee . . . , trustee, examiner, or other party as the court may direct.” Fed. R. Bankr. P. 1007(c).

6. Section 105(a) of the Bankruptcy Code, which codifies the equitable powers of the bankruptcy court, authorizes the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a). In light of the facts and circumstances surrounding these chapter 11 cases, the Court has authority, consistent with section 521(a) of the Bankruptcy Code, to grant the relief requested herein.

7. In these cases, the Debtors’ have more than 200 potential creditors, and absent the relief requested herein, the Debtors must file the Schedules and Statements within fourteen (14) days after the Petition Date, which is February 5, 2019. The Court’s grant of an extension of time to file the Schedules and Statements through and including the Deadline is appropriate in light of the circumstances. The purposes of filing Schedules and Statements are to provide notice to creditors and to disclose information about the debtor to holders of claims. While the Debtors, with the assistance of their professional advisors, will be working diligently and expeditiously to prepare the Schedules and Statements, the Debtors’ resources are particularly limited at this juncture. Given the amount of work required to complete the Schedules and Statements, and the competing demands on the Debtors’ employees and professionals to stabilize the Debtors’ business operations during the initial phase of these chapter 11 cases and to provide continued support to the Debtors’ efforts to execute their restructuring strategy, the Debtors likely will not be able to properly and accurately complete the Schedules and Statements within the initial fourteen-day period prescribed by Bankruptcy Rule 1007(c).

8. Accordingly, the Debtors request that the Court extend the time to file the Schedules and Statements through and including the Deadline.

Notice

9. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the Northern District of Illinois; (ii) each Debtor's twenty (20) largest unsecured creditors; (iii) entities that have filed UCC-1 financing statements against the Debtors; and (iv) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully request that no further notice is required. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

WHEREFORE, the Debtors respectfully request entry of the of an order (i) extending the initial fourteen (14) day period to file the Schedules and Statements through and including the Deadline, without prejudice to the Debtors' right to request additional time if necessary; and (ii) granting related relief.

Respectfully submitted,

PERFECT BROW ART, INC., ET AL.

Dated: January 23, 2019

By: /s/ Harold D. Israel

Harold D. Israel
Jeffrey M. Goldberg
GOLDSTEIN & MCCLINTOCK LLP
111 W. Washington Street, Suite 1221
Chicago, IL 60602
Telephone: (312) 337-7700
Facsimile: (312) 277-2310

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 (I) EXTENDING THE TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES
AND STATEMENTS OF FINANCIAL AFFAIRS, AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”) of Perfect Brow Art, Inc. and its debtor affiliates, as debtors-and-debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), pursuant to sections 105(a) and 521(a) of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order (i) extending the initial fourteen (14) day period to file their schedules of assets and liabilities and statements of financial affairs (collectively, the “Schedules and Statements”), and (ii) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and 1334(b); and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief sought in the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Motion is granted to the extent set forth herein.
2. The time by which the Debtors shall file their Schedules and Statements is extended, through and including the March 8, 2019.
3. Such extension is without prejudice to the Debtors’ right to request a further extension.
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
5. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order.
6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Enter:

Dated:

Honorable Donald R. Cassling
United States Bankruptcy Judge

Prepared by:

Harold D. Israel
Jeffrey M. Goldberg
GOLDSTEIN & MCCLINTOCK LLP
111 W. Washington Street, Suite 1221
Chicago, IL
Telephone: (312) 337-7700
Facsimile: (312) 277-2310