

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re: §  
§  
STAGE STORES, INC., *et al.*, § Chapter 11  
§  
Debtors.<sup>1</sup> § Case No. 20-32564 (DRJ)  
§  
§ (Joint Administration Requested)  
§

**ACTION PROPERTIES, LLC’S OBJECTION TO DEBTORS’ EMERGENCY  
MOTION FOR ENTRY OF AN ORDER (I) APPROVING PROCEDURES TO  
REJECT OR ASSUME EXECUTORY CONTRACTS AND UNEXPIRED LEASES,  
AND (II) GRANTING RELATED RELIEF**

**[RELATES TO DOCKET NO. 21]**

Action Properties, LLC (“Action Properties”) objects to the *Debtors’ Emergency Motion for Entry of an Order (I) Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Dkt. No. 21]* (the “Motion”) filed by the above-captioned debtors and debtors-in-possession (together, the “Debtors”). In support thereof, Action Properties states as follows:

1. Action Properties is lessor under thirteen commercial real estate leases (together, the “Leases”) by and between Action Properties and Specialty Retailers, Inc. for locations in seven states.

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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 tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors’ service address is: 2425 West Loop South, Houston, Texas 77027.



2. A seven day notice period for proposed rejection of leases is inadequate, particularly since many business are operating on a shelter-at-home basis and may not be able to retrieve mail timely, even though the Postal Service remains operational.

3. Because Action Properties received less than 24 hours' notice of the Motion, Action Properties reserves the right to raise other and further objections in connection with the Motion.

WHEREFORE, Action Properties objects to the Motion and reserve all rights. Alternatively, Action Properties requests such other and further relief as the Court deems just and appropriate.

*[Continued on Next Page]*

Dated May 11, 2020.

Respectfully submitted,

/s/ Mark A. Mintz

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**JONES WALKER, LLP**

/s/ Mark A. Mintz

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*Counsel for Action Properties, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2020, I caused a copy of the foregoing document to be served by electronic transmission to all registered ECF users appearing on this case.

/s/ Mark A. Mintz  
Mark A. Mintz