

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

In re:)
) Chapter 11
STAGE STORES, INC., *et al.*,¹)
) Case No. 20-32564 (DRJ)
Debtors.)
) (Jointly Administered)

NOTICE OF JASON CURTIS AND THORSTEN WEBER MOTION FOR ENTRY OF ORDER TO MODIFY THE AUTOMATIC STAY TO PERMIT PAYMENTS UNDER EXECUTIVE EDGE INSURANCE POLICY NUMBER 02-382-05-01

PLEASE TAKE NOTICE that non-Debtors Jason Curtis and Thorsten Weber by and through their undersigned counsel, will move before the Honorable David R. Jones, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “**Court**”), Bob Casey United States Courthouse, 515 Rusk Street, Houston, TX 77002, at **2:00 p.m. (prevailing Central Time) on August 30, 2023** (the “**Hearing Date**”) or as soon thereafter as their counsel can be heard seeking entry of an order, pursuant to section 362(d)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”) permitting the advancement of defense costs under that certain insurance policy identified above notwithstanding section 362 of the Bankruptcy Code, as set forth fully in the motion annexed hereto (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be made in writing and conform with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, and be filed with the Clerk of the Court at the address set forth above, with a copy delivered directly to Bankruptcy Judge Jones Chambers,

¹ 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).



and served upon (i) Cole Shotz P.C., 901 Main Street, Suite 4120, Dallas, Texas 752029, Attn: James W. Walker (jwalker@coleschotz.com) and Sarah Carnes (SCarnes@coleschotz.com); (ii) Baker & Hostetler LLP, 811 Main Street, Suite 1100, Houston, TX 77002, Attn: Nikki L. Morris (nmorris@bakerlaw.com) and Michael A. Sabella (msabella@bakerlaw.com); (iii) Counsel to the Debtors, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Joshua A. Sussberg, P.C. (joshua.sussberg@kirkland.com); (iv) Office of the U.S. Trustee, Region 7, 515 Rusk, Suite 3516 Houston, Texas 77002, Attn: Hector Duran (hector.duran.jr@ust.doj.gov); and (v) any parties required to be served under any applicable Bankruptcy Rule or Local Rule, so as to be filed and actually received by all parties mentioned above **not later than seven (7) days before the Hearing Date.**

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PLEASE TAKE FURTHER NOTICE that failure to file timely, written objections in accordance with the foregoing, may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: August 3, 2023
Houston, Texas

By: BAKER & HOSTETLER LLP

/s/ Nikki L. Morris
Nikki L. Morris
Texas Bar No. 24098143
Federal Bar No. 3257781
811 Main Street
Suite 1100
Houston, TX 77002
Telephone: (713) 751-1600
Email: nmorris@bakerlaw.com

- and -

Michael A. Sabella, Esq.
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Email: msabella@bakerlaw.com

*Attorneys to Non-Debtors Jason
Curtis and Thorsten Weber*

CERTIFICATE OF SERVICE

In accordance with the Federal Rules of Civil Procedure, I hereby certify that on August 3rd, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send notice of this filing to all counsel of record.

/s/ Nikki L. Morris
Nikki L. Morris