

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

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

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE PLAN
ADMINISTRATOR’S SIXTH MOTION FOR AN ORDER EXTENDING
THE CLAIMS OBJECTION DEADLINE UNDER THE CONFIRMED PLAN**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for Steven Balasiano, in his capacity as Plan Administrator of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), certifies as follows:

1. On July 26, 2023, the Plan Administrator filed the *Plan Administrator’s Sixth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1193] (the “**Extension Motion**”).
2. The deadline for the parties to file responses to the relief requested in the Extension Motion was August 16, 2023 (“**Objection Deadline**”). No objections to the Extension Motion were filed on the docket on or before the Objection Deadline. Additionally, counsel for the Plan Administrator did not receive any informal responses to the Extension Motion.

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).



3. The Plan Administrator requests the Court enter the attached proposed order at the earliest convenience of the Court.

Dated: August 18, 2023

/s/ Daniel F.X. Geoghan

Daniel F.X. Geoghan (TX Bar No. 24126280)

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Certificate of Service

I certify that on August 18, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Daniel F.X. Geoghan

Daniel F.X. Geoghan

Exhibit A

Proposed Order

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

In re:

STAGE STORES, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-32564 (DRJ)
)
) (Jointly Administered)
)
) **Re: Docket No.:**

**ORDER APPROVING PLAN ADMINISTRATOR’S SIXTH MOTION FOR AN ORDER
EXTENDING THE CLAIMS OBJECTION DEADLINE
UNDER THE CONFIRMED PLAN**

Upon the motion (the “Motion”)² of Steven Balasiano, in his capacity as Plan Administrator for the chapter 11 estates of Stage Stores, Inc. and Specialty Retailers, Inc. (collectively, the “Debtors”), for entry of an order (this “Order”): (a) extending the Claims Objection Deadline under the Plan and Confirmation Order; and (b) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation

¹The 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).

²Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

1. The Claims Objection Deadline pursuant to the Plan and the Confirmation Order is hereby extended to February 14, 2024, without prejudice to any request for a further extension.
2. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) are satisfied by such notice.
3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.
4. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Houston, Texas

Dated: _____, 2023

THE HONORABLE DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE