

**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> , <sup>1</sup>	)	Case No. 20-32564 (DRJ)
	)	
Debtors.	)	(Jointly Administered)
_____	)	

**PLAN ADMINISTRATOR'S ELEVENTH OMNIBUS  
OBJECTION TO CERTAIN PROOFS OF CLAIM**

(Insufficient Documentation Claims, Late-Filed Claims,  
Amended and Superseded Claims, and Wrong Debtor Claims)

**THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

Steven Balasiano, in his capacity as Plan Administrator of Stage Stores, Inc. and Specialty Retailers, Inc. (together, the “Debtors”), hereby files this eleventh omnibus (non-substantive) objection (this “Objection”) to certain proofs of claim pursuant to Section 502 of Title 11 of the United States Code (the “Bankruptcy Code”), Rules 3001 and 3007 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”) for entry of an order substantially in the form attached hereto as Exhibit B (the

<sup>1</sup> The Debtors, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900).



“Proposed Order”) disallowing and expunging certain proofs of claim (the “Proofs of Claim”). In support of the Objection, the Plan Administrator submits the Declaration of Douglas W. Squasoni of Saccullo Business Consulting, LLC attached hereto as Exhibit A (the “Squasoni Declaration”), and respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). The Plan Administrator consents to entry of a final order under Article III of the United States Constitution.

2. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

### **BACKGROUND**

3. On May 10, 2020 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. Additional information about the Debtors’ business and the events leading up to the Petition Date can be found in the *Disclosure Statement for the Amended Joint Chapter 11 Plan of Stage Stores, Inc. and Specialty Retailers, Inc.* [Docket No. 535].

5. On June 18, 2020, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Request for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Date, and (V) Granting Related Relief* [Docket No. 478] (the “Bar Date Order”). Among other things, the Bar Date Order established (i) July 24, 2020 at 5:00 p.m. (CT) as the general deadline for all persons and entities, other than governmental units, to file prepetition claims against the Debtors’ estates (the “General Bar Date”) and (ii) November 6, 2020 at 5:00 p.m. (CT) as the deadline for all governmental units to file prepetition claims against the

Debtors' estates (the "Governmental Bar Date", and together with the General Bar Date, the "Bar Dates").

6. On August 13, 2020, the Debtors filed the *Joint Second Amended Chapter 11 Plan of Stage Stores, Inc. and Specialty Retailers, Inc.* [Docket No. 694] (the "Plan").

7. On August 14, 2020, the Court entered the *Order Confirming the Joint Second Amended Chapter 11 Plan of Stage Stores, Inc. and Specialty Retailers, Inc.* [Docket No. 705] (the "Confirmation Order").

8. The effective date of the Plan occurred on October 30, 2020 [Docket No. 898] (the "Effective Date"). On the Effective Date, Steven Balasiano, in his capacity as Plan Administrator, became the sole representative of the Debtors' estates for the purpose of, *inter alia*, making or facilitating distributions contemplated under the Plan. *See* Plan Art.IV.D.

9. The Confirmation Order established (i) September 14, 2020 as the initial bar date for Administrative Claims<sup>2</sup> arising after the Petition Date through the date the Confirmation Order was entered (the "First Administrative Bar Date") and (ii) November 30, 2020 as the final bar date for Administrative Claims arising on or after the date the Confirmation Order was entered but prior to the Effective Date (the "Final Administrative Bar Date", and together with the First Administrative Bar Date, the "Administrative Bar Dates"). Both the Plan and Confirmation Order expressly provide that "requests for payment of Allowed Administrative Claims must be Filed and served on the Debtors or the Wind-Down Debtors no later than the Administrative Claims Bar Date. Holders of Administrative Claims that are required to, but do

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<sup>2</sup> The Plan defined "Administrative Claim" as a "[c]laim for the costs and expenses of administration of the Estates entitled to priority under sections 503(b), 507(a)(2), 507(b), or 1114(e)(2) of the Bankruptcy Code including: (a) the actual and necessary costs and expenses incurred on or after the Petition Date of preserving the Estates and operating the businesses of the Debtors; and (b) Allowed Professional Fee Claims in the Chapter 11 Cases." *See* Plan Art. I.A.2.

not, File and serve a request for payment of such Administrative Claims by such date shall be forever barred, estopped, and enjoined from asserting such Administrative Claims against the Debtors or their property, and such Administrative Claims shall be deemed satisfied, settled, and released as of the Effective Date.” See Plan Art. II.A; Confirmation Order ¶ 119.

10. As of the date hereof, the Plan Administrator has filed ten (10) omnibus claims objections to certain Proofs of Claim to date, all of which have been approved by the Court. See Docket Nos. 1124, 1125, 1138, 1139, 1141, 1142, 1143, 1144, 1185, 1186.

11. In addition, on July 7, 2022, the Court entered the *Order (A) Approving Omnibus Claims Objection Procedures and Filing of Substantive Omnibus Claims Objections, (B) Waiving the Requirement of Bankruptcy Rule 3007(E)(6), and (C) Granting Related Relief* [Docket No. 1161] (the “Claims Objection Procedures Order”).

12. Pursuant to the Claims Objection Procedures Order, the Plan Administrator may, among other things:

(a) file omnibus objections that include objections to claims on any basis provided for in Bankruptcy Rule 3007(d), Bankruptcy Local Rule 3007-1, and/or the Additional Grounds;<sup>3</sup> and

(b) object to more than 100 claims in a single omnibus objection on any of the bases set forth in Bankruptcy Rule 3007(d) or the Additional Grounds.

### **RELIEF REQUESTED**

13. As part of the claims reconciliation process, the Plan Administrator has identified particular Proofs of Claim that should be disallowed and expunged in their entirety because they

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<sup>3</sup> The “Additional Grounds” include claims that (a) are inconsistent with the Debtors’ books and records; (b) fail to specify the asserted claim amount (or only list the claim amount as “unliquidated”); (c) seek recovery of amounts for which the Debtors are not liable; (d) have been formally withdrawn by the claimant through the filing of a pleading or through the entry of a Court order indicating withdrawal of the claim; (e) are filed against non-Debtors or are filed against multiple Debtors; (f) are incorrectly or improperly classified; (g) fail to specify a Debtor against whom the claim is asserted; (h) are disallowed pursuant to section 502 of the Bankruptcy Code; and (i) fail to sufficiently specify the basis for the claim or provide sufficient supporting documentation.

either (i) fail to provide sufficient supporting documentation for the Plan Administrator to verify the underlying merits of the claim, (ii) were untimely filed after the applicable Bar Date or Administrative Bar Dates, (iii) amend and supersede subsequently filed claims, or (iv) were filed in the wrong case and against the wrong Debtor entity. For the reasons set forth below, the Plan Administrator objects to each of the Proofs of Claim identified on (i) Schedule 1 to the Proposed Order (“Insufficient Documentation Claims”), (ii) Schedule 2 to the Proposed Order (“Late-Filed Claims”), (iii) Schedule 3 to the Proposed Order (“Amended and Superseded Claims”), and (iv) Schedule 4 to the Proposed Order (“Wrong Debtor Claims”, and together with the Insufficient Documentation Claims, Late-Filed Claims, and Amended and Superseded Claims, the “Disputed Claims”). Pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and the Claims Objection Procedures Order, the Plan Administrator respectfully seeks entry of the Proposed Order disallowing and expunging the Disputed Claims.

#### **BASIS FOR RELIEF REQUESTED**

14. A filed proof of claim is deemed allowed unless a party in interest objects. *See* 11 U.S.C. § 502(a). Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See id.* § 1111(a) (stating that a proof of claim is deemed filed under section 501 of the Bankruptcy Code for any claim appearing in the schedules, except those “scheduled as disputed, contingent, or unliquidated”). As such, the Plan Administrator must review all claims, including those appearing in the Schedules and Statements, in these chapter 11 cases as part of the claims reconciliation process.

15. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re O’Connor*, 153 F.3d 258, 260 (5th Cir. 1998); *In re Tran*, 351 B.R. 440, 444 (Bankr. S.D. Tex. 2006), *aff’d*, 369 B.R. 312 (S.D. Tex. 2007); *In re*

*Texas Rangers Baseball Partners*, No. 10-43400 (DML), 2012 WL 4464550, at \*2 (Bankr. N.D. Tex. Sept. 25, 2012).

16. To receive the benefit of *prima facie* validity, however, a proof of claim must assert factual allegations that would entitle the claimant to recovery. *In re Heritage Org., LLC*, No. 04-35574 (BJH), 2006 WL 6508477, at \*8 (Bankr. N.D. Tex. Jan. 27, 2006). Additionally, a claimant's proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party refutes at least one of the allegations that is essential to the claim's legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988); *In re Starnes*, 231 B.R. 903, 912 (N.D. Tex. 1998). Once an allegation is refuted, "the burden shifts to the claimant to prove its claim by a preponderance of the evidence." *In re Congress, LLC*, 529 B.R. 213, 219 (Bankr. W.D. Tex. 2015). "The ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006).

17. Objections may be joined in an omnibus objection if such objections are based on the grounds that the claims should be disallowed, in whole or in part, for any of eight enumerated reasons in Bankruptcy Rule 3007, including when the claims duplicate other claims or were not timely filed. Fed. R. Bankr. P. 3007(d). Further, pursuant to the Claims Objection Procedures Order, the Plan Administrator (i) may file an omnibus objection to claims on the Additional Grounds and (ii) may include more than 100 claims on such omnibus objection.

18. Accordingly, the Disputed Claims are not enforceable and should be disallowed and expunged for the reasons set forth below and in Schedules 1-4.

## **OMNIBUS OBJECTION**

### **A. Insufficient Documentation Claims**

19. With respect to each of the Insufficient Documentation Claims identified on Schedule 1 to the Proposed Order, the Plan Administrator has carefully reviewed the Debtors' books and records and the Proofs of Claim, including the supporting documentation provided by the claimants, if any, and has determined that the Proofs of Claim contain insufficient information and/or documentation to allow the Plan Administrator to ascertain the validity of the claim. As such, each of the Insufficient Documentation Claims fails to satisfy the requirements for a proof of claim.

20. For the reasons set forth above and in Schedule 1 to the Proposed Order, the Plan Administrator seeks to disallow and expunge the Insufficient Documentation Claims in their entirety. Disallowing and expunging the Insufficient Documentation Claims is necessary to ensure that the claimants ultimately entitled to receive distributions from the Debtors' estates receive the appropriate treatment and distribution.

### **B. Late-Filed Claims**

21. With respect to each of the Late-Filed Claims identified on Schedule 2 to the Proposed Order, the Plan Administrator has carefully reviewed the Proofs of Claim, including the supporting documentation provided by the claimants, if any, and determined that the Late-Filed Claims were not timely filed. Among other things, the Bar Date Order established (i) July 24, 2020 as the General Bar Date by which all persons and entities (subject to certain exceptions not relevant here) holding or wishing to assert a claim against either of the Debtors that arose before the Petition Date to file proof of such claim in writing and (ii) November 6, 2020 as the Governmental Bar Date by which all governmental units holding or wishing to assert a claim against either of the Debtors that arose before the Petition Date to file proof of such

claim in writing. Also, among other things, the Confirmation Order established (i) September 14, 2020 as the First Administrative Bar Date for Administrative Claims arising after the Petition Date through the date the Confirmation Order was entered to be filed and (ii) November 30, 2020 as the Final Administrative Bar Date for Administrative Claims arising on or after the date the Confirmation Order was entered but prior to the Effective Date to be filed.

22. The Plan Administrator objects to the Late-Filed Claims because they (a) were subject to either the General Bar Date, Governmental Bar Date, First Administrative Bar Date or Final Administrative Bar Date, as applicable and (b) were filed after the applicable Bar Date or Administrative Bar Dates. Moreover, the Plan Administrator believes that each claimant asserting a Late-Filed Claim was provided timely and adequate notice of the applicable Bar Date or Administrative Bar Dates.

23. For the reasons set forth above and in Schedule 2 to the Proposed Order, the Plan Administrator seeks to disallow and expunge the Late-Filed Claims in their entirety. Disallowing and expunging the Late-Filed Claims is necessary to ensure that the claimants ultimately entitled to receive distributions from the Debtors' estates receive the appropriate treatment and distribution.

**C. Amended and Superseded Claims**

24. With respect to each of the Amended and Superseded Claims identified on Schedule 3 to the Proposed Order, the Plan Administrator has carefully reviewed the Debtors' books and records and the Proofs of Claim, including supporting documentation provided by the claimants, if any, and has determined that the Amended and Superseded Claims have been amended by a subsequently filed Proof of Claim against the Debtors (collectively, the "Surviving Claims"), which the Plan Administrator has identified on Schedule 3 to the Proposed Order.



25. For the reasons set forth above and in Schedule 3 to the Proposed Order, the Plan Administrator seeks to disallow and expunge the Amended and Superseded Claims. Failure to disallow and expunge the Amended and Superseded Claims could result in the applicable claimants receiving an unwarranted recovery to the detriment of other similarly situated creditors.

26. For the avoidance of doubt, this Objection does not affect the Surviving Claims, and the Plan Administrator reserves the right to object to the Surviving Claims, as well as the Amended and Superseded Claims, on any grounds whatsoever.

**D. Wrong Debtor Claims**

27. With respect to each of the Wrong Debtor Claims identified on Schedule 4 to the Proposed Order, the Plan Administrator has carefully reviewed the Debtors' books and records and the Proofs of Claim, including supporting documentation provided by the claimants, if any. The Plan Administrator has determined that the claimants identified on Schedule 4 to the Proposed Order filed Proofs of Claim against multiple Debtor entities, and the Wrong Debtor Claims were filed in the wrong case and against the wrong Debtor entity. The Proofs of Claim filed by the claimants in the correct case and against the correct Debtor entity (collectively, the "Surviving Claims") are identified on Schedule 4 to the Proposed Order.

28. For the reasons set forth above and in Schedule 4 to the Proposed Order, the Plan Administrator seeks to disallow and expunge the Wrong Debtor Claims. Failure to disallow and expunge the Wrong Debtor Claims could result in the applicable claimants receiving an unwarranted recovery to the detriment of other similarly situated creditors.

29. For the avoidance of doubt, this Objection does not affect the Surviving Claims, and the Plan Administrator reserves the right to object to the Surviving Claims, as well as the Wrong Debtor Claims, on any grounds whatsoever.

### **SEPARATE CONTESTED MATTER**

30. This Objection to the Disputed Claims constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Plan Administrator requests that any order entered by this Court with respect to an objection asserted herein shall be deemed a separate order with respect to each Disputed Claim.

### **RESERVATION OF RIGHTS**

31. The Plan Administrator expressly reserves the right to amend, modify, or supplement this Objection and to file additional substantive or non-substantive objections to the Disputed Claims, or any other claims (filed or not) which may be asserted against the Debtors. In addition, the Plan Administrator reserves the right to seek further reduction of any claim for any reason including to the extent such claim has been paid, and further reserves the right to raise further objections.

### **COMPLIANCE WITH LOCAL RULES**

32. This Objection includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated, and a discussion of their application to this Objection. The Plan Administrator has served notice of this Objection on those persons whose names appear in the signature blocks on the Disputed Claims, and in accordance with Bankruptcy Rule 7004. Finally, the Plan Administrator submits that this Objection satisfies Local Rule 3007-1.

### **NO PREVIOUS REQUEST**

33. No previous request for the relief sought herein has been made by the Plan Administrator to this or any other court.

**NOTICE**

34. Notice of this Objection has been provided to the parties listed on Schedules 1-4 of the Proposed Order on those persons whose names appear in the signature blocks on the Disputed Claims.

**WHEREFORE**, the Plan Administrator respectfully requests that the Court (i) enter an order, substantially in the form attached hereto as Exhibit B, granting the relief requested herein and (ii) grant such other and further relief as it deems just and proper.

Dated: September 15, 2023

/s/ Daniel F.X. Geoghan

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

**COLE SCHOTZ P.C.**

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- and -

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Counsel to Steven Balasiano, in his capacity as Plan Administrator of Stage Stores, Inc., *et al.*

**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> , <sup>1</sup>	)	Case No. 20-32564 (DRJ)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF THE PLAN ADMINISTRATOR'S  
ELEVENTH OMNIBUS CLAIMS OBJECTION**

**THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 30 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**Important Information Regarding the Objection**

Grounds for the Objection. By the Objection, the Plan Administrator is seeking to disallow and expunge your claim(s) listed in the schedule attached hereto on the grounds that your claim(s) (i) provide insufficient documentation, (ii) were filed after the applicable Bar Date or Administrative Bar Dates, (iii) were amended and superseded by a subsequently filed claim, or (iv) were filed in the wrong case and against the wrong Debtor entity. The claim(s) subject to

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<sup>1</sup> The Debtors, 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 Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Objection Procedures. On July 29, 2022, the United States Bankruptcy Court for the Southern District of Texas (the “Court”) entered an order [Docket No. 1161] approving procedures for filing and resolving objections to claims asserted against the Debtors in these chapter 11 cases (the “Objection Procedures”). A copy of the Objection Procedures is included with this notice.

Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.

### **Resolving the Objection**

Parties Required to File a Response. If you disagree with the Objection filed with respect to your claim, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption with the name of the Court, the name of the Debtors, the case number, and the title of the Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the Objection with respect to your claim, including the specific factual and legal bases upon which you rely in opposing the Objection;
- (c) copies of documentation or other evidence of your claim not previously filed with proof of such claim on which your Response is based (excluding confidential, proprietary, or other protected information, copies of which **must** be provided to the counsel to the Plan Administrator, subject to appropriate confidentiality constraints, if any);
- (d) a declaration or other statement of a person with personal knowledge of the relevant facts that support the Response; and
- (e) the following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant’s attorney or designated representative to whom the attorneys for the Plan Administrator should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Objection on your behalf.

Notice and Service. Your Response must be filed with the Court and served so as to be **actually received** by 5:00 p.m. (prevailing Central Time) on October 16, 2023, (the “Response Deadline”) by the following parties (the “Notice Parties”):

<p><b><i>Counsel to the Plan Administrator</i></b></p>
<p>Daniel F.X. Geoghan <b>COLE SCHOTZ P.C.</b> 901 Main Street, Suite 4120 Dallas, Texas 75202 <a href="mailto:dgeoghan@coleschotz.com">dgeoghan@coleschotz.com</a></p> <p>-and-</p> <p>Seth Van Aalten Sarah A. Carnes Bryant P. Churbuck <b>COLE SCHOTZ P.C.</b> 1325 Avenue of the Americas, 19th Floor New York, New York 10019 <a href="mailto:svanaalten@coleschotz.com">svanaalten@coleschotz.com</a> <a href="mailto:scarnes@coleschotz.com">scarnes@coleschotz.com</a> <a href="mailto:bchurbuck@coleschotz.com">bchurbuck@coleschotz.com</a></p>
<p><b><i>U.S. Trustee</i></b></p>
<p>Hector Duran, Jr., Esq. <b>Office of the United States Trustee for the Southern District of Texas</b> 515 Rusk Street, Suite 3516 Houston, Texas 77002 <a href="mailto:hector.duran.jr@usdoj.com">hector.duran.jr@usdoj.com</a></p>

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent an agreement with the Plan Administrator resolving the Objection to a claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing.** Upon entry of an order, affected creditors will be served with a notice of entry, and a copy, of the order.

### **Hearing on the Objection**

Date, Time, and Location. A hearing (the “Hearing”) on the Objection will be held on October 25, 2023 at 2:00 p.m. prevailing Central Time, before the Honorable David R. Jones, United States Bankruptcy Judge, in Courtroom 400, 515 Rusk, Houston, Texas 77002. You may participate in the Hearing either in person or via audio/video connection with the instructions included at the top of this Notice. The Hearing may be adjourned to a subsequent date in these chapter 11 cases in the Plan Administrator’s sole discretion. **You must attend the Hearing if**

**you disagree with the Objection and have filed a Response.** Contested claims for which (a) a Response is filed in accordance with the proposed response procedures, but such Response is not resolved prior to the Hearing and (b) an appearance is made at the Hearing may be heard at the Hearing or adjourned to a subsequent hearing in the Plan Administrator's sole discretion. If a subsequent hearing is determined to be necessary, the Plan Administrator shall file with the Court and serve on the affected claimants a notice of the hearing (the date of which shall be determined in consultation with the affected claimant(s)).

Discovery. If the Plan Administrator determines that discovery is necessary in advance of a hearing on an Objection, the Plan Administrator will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Any such notice may be incorporated into the initial agenda letter for the hearing or may be provided by separate notice.

### **Additional Information**

Questions or Information. Copies of the Objection Procedures and any other pleadings (collectively, the "Pleadings") filed in these chapter 11 cases are available at no cost at the Debtors' restructuring website <http://www.kccllc.net/stagestores>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court's website at <http://www.txs.uscourts.gov/bankruptcy>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Please do not contact the Court to discuss the merits of any claim or any Objection filed with respect thereto.

### **Reservation of Rights**

**NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE PLAN ADMINISTRATOR TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS OBJECTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS OBJECTION; OR (E) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR PLAN ADMINISTRATOR UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.**

*[Remainder of page intentionally left blank.]*

Dated: September 15, 2023

/s/ Daniel F. X. Geoghan

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

**COLE SCHOTZ P.C.**

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- and -

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bchurbuck@coleschotz.com

Counsel to Steven Balasiano, in his capacity as Plan  
Administrator of Stage Stores, Inc., *et al.*



**Exhibit A**

Squasoni Declaration

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

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

**DECLARATION OF DOUGLAS W. SQUASONI OF SACCULLO  
BUSINESS CONSULTING, LLC IN SUPPORT OF PLAN ADMINISTRATOR'S  
ELEVENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

(Insufficient Documentation Claims, Late-Filed Claims,  
Amended and Superseded Claims, and Wrong Debtor Claims)

I, Douglas W. Squasoni, hereby declare under penalty of perjury:

1. I am a senior consultant at Saccullo Business Consulting, LLC ("SBC"). On or about November 4, 2020, SBC was retained by the Plan Administrator as a restructuring consultant to help facilitate the liquidation of the Debtors' remaining assets pursuant to the Plan and Confirmation Order. I have more than 27 years of experience in the restructuring industry, including many years of providing consulting and advisory services in post-confirmation chapter 11 cases.

2. I am generally familiar with the Debtors' books and records, and am overseeing the Plan Administrator's review and reconciliation of claims filed against the Debtors' estates.

3. I have read the Objection, filed contemporaneously herewith.

4. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the Disputed Claims, I have reviewed and overseen the

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<sup>1</sup> The Debtors, along with the last four digits of each Debtor's federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900).

review and analysis of the Debtors' books and records and the relevant Proofs of Claim, as well as the supporting documentation provided by each claimant, and have determined that each Disputed Claim should be disallowed and expunged in its entirety as set forth in Schedules 1-4 to the Proposed Order. As such, I believe that the relief requested in the Objection is appropriate.

5. I have, or a member of my team working under my supervision has, thoroughly reviewed the Debtors' books and records and the claims register and determined that (i) each Insufficient Documentation Claim fails to include sufficient information or supporting documentation to ascertain the validity of the asserted claim, (ii) each Late-Filed Claim was filed after the applicable Bar Date or Administrative Bar Dates, and thus was not timely filed as required by the Bar Date Order or Confirmation Order, (iii) each Amended and Superseded Claim was amended by a subsequently filed proof of claim, and (iv) each Wrong Debtor Claim was filed in the wrong case and against the wrong Debtor entity.

6. I understand that the failure to disallow and expunge the Disputed Claims could result in the applicable claimants receiving an improper recovery on account of such claims, to the detriment of the Debtors' other, similarly situated creditors. As such, I believe that the disallowance of the Disputed Claims as set forth in Schedules 1-4 to the Proposed Order is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct to the best of my knowledge, information, and belief.

Dated: September 15, 2023

/s/ Douglas W. Squasoni

Douglas W. Squasoni

Saccullo Business Consulting, LLC

**Exhibit B**

Proposed Order

**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> , <sup>1</sup>	)	Case No. 20-32564 (DRJ)
	)	
Debtors.	)	(Jointly Administered)
	)	

**ORDER GRANTING PLAN ADMINISTRATOR’S ELEVENTH  
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

(Insufficient Documentation Claims, Late-Filed Claims,  
Amended and Superseded Claims, and Wrong Debtor Claims)

Upon the Plan Administrator’s eleventh omnibus objection (the “Objection”)<sup>2</sup> seeking to disallow and expunge the Disputed Claims pursuant to Bankruptcy Code Section 502; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. 157 and §§ 1334(b); and the Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Plan Administrator consents to entry of a final order under Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and it appearing that proper and adequate notice of the Objection has been given, under the circumstances, and that no other or further

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<sup>1</sup> The Debtors, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900).

<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Objection.

notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefore,

**IT IS ORDERED, ADJUDGED AND DECREED THAT:**

1. The Objection is SUSTAINED as set forth herein.
2. The Insufficient Documentation Claims listed on Schedule 1 attached hereto are hereby disallowed and expunged in their entirety.
3. The Late-Filed Claims listed on Schedule 2 hereto are hereby disallowed and expunged in their entirety.
4. The Amended and Superseded Claims listed on Schedule 3 hereto are hereby disallowed and expunged in their entirety.
5. The Wrong Debtor Claims listed on Schedule 4 hereto are hereby disallowed and expunged in their entirety.
6. Notwithstanding anything to the contrary contained herein, nothing herein shall affect the validity, nature, amount, allowability, priority, or otherwise seek to reclassify, disallow, or expunge any Proof of Claim set forth on Schedules 1-4 hereto or, in the case of the Amended and Superseded Claims and Wrong Debtor Claims, any Surviving Claim.
7. The Plan Administrator's rights to amend, modify, or supplement the Objection, to file additional objections to any claims (filed or not) asserted against the Debtors, and to seek further reduction of any claim to the extent such claim has been paid, are preserved. Additionally, should one or more grounds of objection stated in the Objection be overruled, the Plan Administrator's rights to object on other stated grounds or on any other grounds that the Plan Administrator discovers are further preserved.

8. The claims, noticing, and solicitation agent, Kurtzman Carson Consultants LLC, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in the Order.

9. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.

10. This Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Order.

Houston, Texas

Dated: \_\_\_\_\_, 2023

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THE HONORABLE DAVID R. JONES  
UNITED STATES BANKRUPTCY JUDGE

**SCHEDULE 1**

Insufficient Documentation Claims



ASSERTED CLAIMS						MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	ALLEN, AMY R	1445	07/07/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 1,000.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 1,000.00		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
2	BLASIG, SHAWNA D	2352	07/17/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 5,760.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 5,760.00		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
3	BLASKOWSKY, DELIDA	2238	07/15/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 700.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 700.00		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for "credit card/employee wages" under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
4	BRAY, LISA M	1962	07/13/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	UNLIQUIDATED		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	UNLIQUIDATED		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for "overtime hours" under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
5	Castillo, Raquel	1985	07/13/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					503(b)(9)	\$ -		503(b)(9)	\$ -
					Priority Unsecured	BLANK		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	BLANK		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
6	CURVEY, JODY V	1588	07/08/2020	Stage Stores, Inc.	Secured	\$ 50.00	Stage Stores, Inc.	Secured	\$0.00
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 300.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 350.00		Subtotal	\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.									
7	DESTINY DWANA DAVIS	5885	04/17/2023	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 4,000.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -

				Subtotal	\$	4,000.00					Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
8 Duncan, Cecily	4072	07/27/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	2,000.00		Priority Unsecured			\$0.00		
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	2,000.00		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
9 ERWIN, KATHARINE L	2705	07/21/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	16,250.00		Priority Unsecured			\$0.00		
				General Unsecured	\$	12,750.00		General Unsecured			\$0.00		
				Subtotal	\$	29,000.00		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records indicate that claimant failed to return to work after February 19, 2019. Debtor's books and records do not reflect amounts owed to claimant.													
10 FRY, STEVIE R	2331	07/16/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured		UNLIQUIDATED		Priority Unsecured			\$0.00		
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal		UNLIQUIDATED		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
11 GOODRUM, MELISSA M	2642	07/20/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	200.00		Priority Unsecured			\$0.00		
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	200.00		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claim is for "wages while not clocked in." Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
12 Kearia Wright	5713	11/10/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	4,300.00		Priority Unsecured			\$0.00		
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	4,300.00		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
13 KHALIL MAURICE MOORE	2122	07/14/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	7.25		Priority Unsecured			\$0.00		
				General Unsecured	\$	13,642.75		General Unsecured			\$0.00		
				Subtotal	\$	13,650.00		Subtotal			\$0.00		
Reason: Objection, insufficient documentation. Claim is for "unfair wages & time." Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
14 LAM YUEN, DANIELLE	5598	10/22/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	700.00		Priority Unsecured			\$0.00		
				General Unsecured	\$	-		General Unsecured	\$	-			

				Subtotal	\$	700.00					Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for "unpaid wages/unauthorized enrollment in health insurance" under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
15 Leonard Brown	1600	07/09/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				503(b)(9)	\$	-		503(b)(9)	\$	-			
				Priority Unsecured	\$	1,200.00		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	1,200.00		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
16 Luce, Sarai J	2971	07/23/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				503(b)(9)	\$	-		503(b)(9)	\$	-			
				Priority Unsecured	\$	879.00		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	879.00		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
17 Mathis, Daaniel	2097	07/14/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	13,750.00		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	13,750.00		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
18 MCDADE, PAULA J	1944	07/13/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured		BLANK		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal		BLANK		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for unpaid reward related to contest under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
19 MCDUFFIE, DENADIA L	1855	07/12/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	3,025.00		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	3,025.00		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for "money loaned" under section 507(a)(7). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect lease with or amounts owed to claimant.													
20 Mitchell John Dearie	1244	07/06/2020	Specialty Retailers, Inc.	Secured	\$	-	Specialty Retailers, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			
				Priority Unsecured	\$	5,000.00		Priority Unsecured			\$	0.00	
				General Unsecured	\$	-		General Unsecured	\$	-			
				Subtotal	\$	5,000.00		Subtotal				\$0.00	
Reason: Objection, insufficient documentation. Claim is for "discrimination wrongful termination" under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.													
21 Moten-Roddy, Shaylaya	1519	07/08/2020	Specialty Retailers, Inc.	Secured	\$	-	Specialty Retailers, Inc.	Secured	\$	-			
				Administrative	\$	-		Administrative	\$	-			

				Priority Unsecured	\$	3,000.00		Priority Unsecured	\$	0.00
				General Unsecured	\$	25.00		General Unsecured	\$	0.00
				Subtotal	\$	3,025.00		Subtotal	\$	0.00
Reason: Objection, insufficient documentation. Claim is for "bankruptcy" under section 507(a)(7). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect lease with or amounts owed to claimant.										
22 ORTIZ, SERENA A	4192	07/29/2020	Specialty Retailers, Inc.	Secured	\$	-	Specialty Retailers, Inc.	Secured	\$	-
				Administrative	\$	-		Administrative	\$	-
				Priority Unsecured	\$	107.55		Priority Unsecured	\$	0.00
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal	\$	107.55		Subtotal	\$	0.00
Reason: Objection, insufficient documentation. Claim is for "wages for employment Jan-Mar 2019" under section 507(a)(4). Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.										
23 PHILLIPS, GREG	1765	07/10/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
				Administrative	\$	-		Administrative	\$	-
				Priority Unsecured		UNLIQUIDATED		Priority Unsecured		0.00
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal		UNLIQUIDATED		Subtotal		0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.										
24 Purtell, Brenda K	3004	07/23/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
				Administrative	\$	-		Administrative	\$	-
				Priority Unsecured	\$	1,200.00		Priority Unsecured		0.00
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal	\$	1,200.00		Subtotal		0.00
Reason: Objection, insufficient documentation. Claim is for unpaid severance. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect severance package offered to claimant.										
25 Raymond, Kim	4070	07/27/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
				Administrative	\$	-		Administrative	\$	-
				Priority Unsecured		UNLIQUIDATED		Priority Unsecured		0.00
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal		UNLIQUIDATED		Subtotal		0.00
Reason: Objection, insufficient documentation. Claim is for wages and salary. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.										
26 Santori, Andrew E	1729	07/10/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
				Administrative	\$	-		Administrative	\$	-
				Priority Unsecured	\$	946.00		Priority Unsecured		0.00
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal	\$	946.00		Subtotal		0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.										
27 SCOTT, JACQUELINE D	4224	07/31/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
				Administrative		BLANK		Administrative		0.00
				Priority Unsecured	\$	-		Priority Unsecured	\$	-
				General Unsecured	\$	-		General Unsecured	\$	-
				Subtotal		BLANK		Subtotal		0.00
Reason: Objection, insufficient documentation. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.										
28 Sparrow, Jawanna	1247	07/06/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-

				Administrative	\$	-		Administrative	\$	-	
				Priority Unsecured	\$	3,000.00		Priority Unsecured	\$	\$0.00	
				General Unsecured	\$	-		General Unsecured	\$	-	
				Subtotal	\$	3,000.00		Subtotal		\$0.00	
Reason: Objection, insufficient documentation. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
29	Tahanee Yasin	4698	08/17/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
					Administrative	\$	-		Administrative	\$	-
					Priority Unsecured	\$	3,500.00		Priority Unsecured		\$0.00
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	\$	3,500.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for wages and salary. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
30	Tanner, Kismet T	4142	07/28/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
					Administrative	\$	-		Administrative	\$	-
					Priority Unsecured	\$	1,000.00		Priority Unsecured		\$0.00
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	\$	1,000.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for wages and salary. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
31	TEETER, DONNA	2479	07/19/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
					Administrative	\$	-		Administrative	\$	-
					Priority Unsecured	\$	1,000.00		Priority Unsecured		\$0.00
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	\$	1,000.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for wages and salary. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
32	TILLMAN, JOWANDA C	5833	01/11/2021	Stage Stores, Inc.	Secured	\$	500.00	Stage Stores, Inc.	Secured		\$0.00
					Administrative	\$	-		Administrative	\$	-
					Priority Unsecured	\$	-		Priority Unsecured	\$	-
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	\$	500.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
33	WHITEHEAD, AMBER	1258	07/06/2020	Stage Stores, Inc.	Secured	\$	-	Stage Stores, Inc.	Secured	\$	-
					Administrative	\$	-		Administrative	\$	-
					Priority Unsecured	UNLIQUIDATED			Priority Unsecured		\$0.00
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	UNLIQUIDATED			Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											
34	WILLIAMS, CRYSTAL E	4738	08/20/2020		Secured	\$	-		Secured	\$	-
					Administrative	\$	1,900.00		Administrative		\$0.00
					Priority Unsecured	\$	2,189.00		Priority Unsecured		\$0.00
					General Unsecured	\$	-		General Unsecured	\$	-
					Subtotal	\$	4,089.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for services performed. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtor's books and records do not reflect amounts owed to claimant.											

**SCHEDULE 2**

Late-Filed Claims

ASSERTED CLAIMS						MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	BLR Elizabethton LLC	5806	12/03/2020	Specialty Retailers	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					503(b)(9)	\$ -		503(b)(9)	\$ -
					Priority Unsecured	UNLIQUIDATED		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	UNLIQUIDATED		Subtotal	\$0.00
Reason: Objection, late filed. Priority claim is for post-petition rent filed after the Administrative Bar Dates. In addition, claim does not comply with the procedures set forth in the Plan and Confirmation Order.									

**SCHEDULE 3**

Amended and Superseded Claims



	CLAIM TO BE DISALLOWED					SURVIVING CLAIM					Objection
	Name of Claimant	Claim #	Date Filed	Debtor Name	Claim Amount	Name of Claimant	Claim #	Date Filed	Debtor Name	Claim Amount	
1	Clark County Treasurer	4293	7/31/2020	Stage Stores, Inc.	Secured \$ 14,291.60	Clark County Treasurer	5865	6/21/2021	Stage Stores, Inc.	Secured \$ 15,195.09	Amended Claim
					Administrative \$ -					Administrative \$ -	
					Priority Unsecured \$ -					Priority Unsecured \$ -	
					General Unsecured \$ -					General Unsecured \$ -	
					Total \$ 14,291.60					Total \$ 15,195.09	

**SCHEDULE 4**

Wrong Debtor Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Beach, Martha	2706	7/21/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ 1,020.00		Administrative	\$0.00
					Priority Unsecured	\$ -		Priority Unsecured	\$ -
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 1,020.00		Subtotal	\$0.00
Reason: Objection, wrong debtor. Claimant filed claim against Stage Stores, Inc. for services performed. Specialty Retailers, Inc. is the entity that employed and paid employees.									
2	Dade, Shimeka M	1266	7/6/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 500.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 500.00		Subtotal	\$0.00
Reason: Objection, wrong debtor. Claimant filed claim against Stage Stores, Inc. for wages and salaries. Specialty Retailers, Inc. is the entity that employed and paid employees.									
3	Vickey Robinson Hall	701	6/1/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 11,500.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 11,500.00		Subtotal	\$0.00
Reason: Objection, wrong debtor. Claimant filed claim against Stage Stores, Inc. for wages and salaries. Specialty Retailers, Inc. is the entity that employed and paid employees.									