

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

In re:

STAGE STORES, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 20-32564 (CML)

Jointly Administered

In re:

Professional Fee Matters Concerning the
Jackson Walker Law Firm

Case No. 23-00645 (EVR)

**WIND-DOWN DEBTORS' JOINDER TO UNITED STATES TRUSTEE'S
AMENDED AND SUPPLEMENTAL MOTION FOR (1) RELIEF FROM
JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE
60(b)(6) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9024
APPROVING THE RETENTION AND COMPENSATION APPLICATIONS
OF JACKSON WALKER LLP, (2) SANCTIONS, AND (3) RELATED RELIEF**

The above-captioned debtors (before the Effective Date of the Plan,² the “**Debtors**,” and following the Effective Date of the Plan, the “**Wind-Down Debtors**”) in the above-captioned chapter 11 cases of Stage Stores, Inc. and Specialty Retailers, Inc (the “**Stage Stores Chapter 11 Cases**”) hereby file their joinder (this “**Joinder**”) to the *Amended and Supplemental Motion for (1) Relief From Judgment Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving the Retention and Compensation Applications of Jackson Walker LLP, (2) Sanctions, and (3) Related Relief* [Docket No. 1241] (the “**Motion**”) filed by Kevin Epstein, United States Trustee for Region 7 (the “**U.S. Trustee**”).

¹ The Wind-Down 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).

² *Joint Second Amended Chapter 11 Plan of Stage Stores, Inc. and Specialty Retailers, Inc.* [Docket No. 694] (the “**Plan**”).



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As set forth in the *Notice of Standing and Indispensable Party Status* [Docket No. 1253] filed in the Stage Stores Chapter 11 Cases, since the Plan's Effective Date, the Debtors have continued in existence as Wind-Down Debtors for purposes of, *inter alia*, facilitating distributions to creditors in accordance with the Plan, including distributing any funds received in connection with the Motion. Under the Plan, "Causes of Action" belonging to the Debtors were expressly preserved and vested in the Wind-Down Debtors. Through this Joinder, the Wind-Down Debtors join and adopt the relief sought in the Motion, including the allegations, arguments, and pleadings made and/or filed by the U.S. Trustee in support thereof, to the extent of seeking (a) to vacate the orders approving the retention and compensation of Jackson Walker LLP as Debtors' counsel, and (b) disgorgement of fees and expenses paid to Jackson Walker in the Stage Stores Chapter 11 Cases.

Dated: December 16, 2024

/s/ Daniel F. X. Geoghan

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

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2024, the foregoing Joinder was served upon all parties that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court.

/s/ Daniel F.X. Geoghan
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