

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 (CML)
	)	
Debtors.	)	(Jointly Administered)
	)	Re: Docket No. 1296

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO PLAN ADMINISTRATOR’S
THIRTEENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

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

1. On August 27, 2025, the Plan Administrator filed the *Plan Administrator’s Thirteenth Omnibus Objection to Certain Proofs of Claim* [Docket No. 1296] (the “**Claims Objection**”).

2. The deadline for the parties to file and serve responses to the Claims Objection was September 26, 2025 (the “**Response Deadline**”). No responses to the Claims Objection were filed on the docket on or before the Response Deadline. Additionally, counsel for the Plan Administrator did not receive any informal responses to the Claims Objection.

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

¹ The Debtors in these chapter 11 cases, along with the last four digits of their federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900).



Dated: September 29, 2025

/s/ Daniel F.X. Geoghan

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

COLE SCHOTZ P.C.

901 Main Street, Suite 4120

Dallas, TX 75202

Telephone: (469) 557-9390

Facsimile: (469) 533-1587

Email: dgeoghan@coleschotz.com

- and -

Seth Van Aalten, Esq. (Admitted *Pro Hac Vice*)

Sarah A. Carnes, Esq. (Admitted *Pro Hac Vice*)

Bryant P. Churbuck, Esq.

COLE SCHOTZ P.C.

1325 Avenue of the Americas, 19th Floor

New York, NY 10019

Telephone: (212) 752-8000

Facsimile: (212) 752-8393

Email: svanaalten@coleschotz.com

scarnes@coleschotz.com

bchurbuck@coleschotz.com

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

Certificate of Service

I certify that on September 29, 2025, 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

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

In re: STAGE STORES, INC., <i>et al.</i> , ¹ Debtors.	)))))))	Chapter 11 Case No. 20-32564 (CML) (Jointly Administered)
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**ORDER SUSTAINING PLAN ADMINISTRATOR’S THIRTEENTH
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

(Reclassify Claim, Satisfied Claims and No Liability Claims)

Upon the Plan Administrator’s thirteenth omnibus objection (the “Objection”)² seeking to (i) reclassify the Reclassify Claim, (ii) reduce the Satisfied Claims, and (iii) disallow and expunge the No Liability 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 notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefore,

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).

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

IT IS ORDERED, ADJUDGED AND DECREED THAT:

1. The Objection is **SUSTAINED** as set forth herein.
2. The Reclassify Claim listed on Schedule 1 hereto is hereby reclassified as set forth in the “Modified Claims” column therein.
3. The Satisfied Claims listed on Schedule 2 hereto are hereby reduced as set forth in the “Modified Claims” column therein.
4. The No Liability Claims listed on Schedule 3 hereto are hereby disallowed and expunged in their entirety.
5. Notwithstanding anything to the contrary contained herein, nothing herein shall affect the validity, nature, amount, allowability, priority, or otherwise seek to reclassify, reduce, disallow, or expunge any Proof of Claim or Modified Claim set forth on Schedule 1, Schedule 2 and Schedule 3 hereto. All parties’ rights are reserved with respect to the Modified Claims, including the Plan Administrator’s right to file a further objection and seek disallowance thereof.
6. 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.
7. The claims, noticing, and solicitation agent, Kurtzman Carson Consultants, LLC dba Verita Global, is authorized and directed to update the claims register maintained in these Chapter 11 Cases to reflect the relief granted in the Order.
8. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.

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

Houston, Texas

Dated: _____, 2025

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Reclassify Claim

Thirteenth Omnibus Claims Objection

Schedule 1 - Reclassify Claim

				ASSERTED CLAIMS			MODIFIED CLAIMS		
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Justin Titcombe	123	5/20/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 14,453.08		Priority Unsecured	\$ 13,650.00
					General Unsecured	\$ -		General Unsecured	\$ 803.08
					Subtotal	\$ 14,453.08		Subtotal	\$ 14,453.08
Reason: Objection, reclassify \$803.08 to general unsecured claim. Claim is for severance. Claim exceeds \$13,650 statutory cap under section 507(a)(4).									

SCHEDULE 2

Satisfied Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Arizona Department of Revenue	4127	7/27/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$310.91		Priority Unsecured	\$0.00
					General Unsecured	\$1,542.34		General Unsecured	\$1,542.34
					Subtotal	\$1,853.25		Subtotal	\$1,542.34
Reason: Objection, priority unsecured portion of claim satisfied in full.									
2	Beach, Martha	4087	7/27/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$1,020.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$1,020.00		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
3	CINDY BRENZA KUYKENDALL	707	6/2/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$5,235.98		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$5,235.98		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
4	CITY OF HINESVILLE	2773	7/22/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$355.36		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$355.36		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
5	Clark, Deborah A	4392	8/6/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$1,541.28		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$1,541.28		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
6	Consuela Kennard Jacobs	638	5/22/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$9,423.08		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$9,423.08		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
7	DAVIS, BLAINE E	1995	7/13/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$793.17		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$793.17		Subtotal	\$0.00
Reason: Objection, satisfied in full.									

				ASSERTED CLAIMS		MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
8	Elizabeth Brewer	631	6/4/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$5,576.92		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$5,576.92		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
9	Hilts, Misty R	1249	7/6/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$1,010.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$1,010.00		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
10	Internal Revenue Service	5890	4/26/2024	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$912,470.84		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$912,470.84		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
11	Internal Revenue Service	5891	6/10/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$116,529.71		Administrative	\$0.00
					Priority Unsecured	\$ -		Priority Unsecured	\$ -
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$116,529.71		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
12	Jacquelyn Hubert	635	6/11/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$23,388.47		General Unsecured	\$23,388.47
					Subtotal	\$37,038.47		Subtotal	\$23,388.47
Reason: Objection, priority unsecured portion of claim satisfied in full.									
13	John N Matzer III	629	6/2/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$84,489.23		General Unsecured	\$84,489.23
					Subtotal	\$98,139.23		Subtotal	\$84,489.23
Reason: Objection, priority unsecured portion of claim satisfied in full.									
14	Julianne Gorgone	717	6/16/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$2,738.46		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$2,738.46		Subtotal	\$0.00
Reason: Objection, satisfied in full.									

Thirteenth Omnibus Claims Objection

Schedule 2 - Satisfied Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
15	Justin Titcombe	123	5/20/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$803.08		General Unsecured	\$803.08
					Subtotal	\$14,453.08		Subtotal	\$803.08
	Reason: Objection, priority unsecured portion of claim satisfied in full.								
16	Kenneth Joseph Lettre	619	5/21/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$3,230.77		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$3,230.77		Subtotal	\$0.00
	Reason: Objection, satisfied in full.								
17	Lauren Ashley Bankler Beck	5792	12/1/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$1,350.00		General Unsecured	\$1,350.00
					Subtotal	\$15,000.00		Subtotal	\$1,350.00
	Reason: Objection, priority unsecured portion of claim satisfied in full.								
18	Linda R Meyers	621	5/22/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$4,435.10		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$4,435.10		Subtotal	\$0.00
	Reason: Objection, satisfied in full.								
19	Ling Wong	1537	7/7/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$1,783.04		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$1,783.04		Subtotal	\$0.00
	Reason: Objection, satisfied in full.								
20	Luann Clendenen	4194	7/27/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$389.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$389.00		Subtotal	\$0.00
	Reason: Objection, satisfied in full.								

Thirteenth Omnibus Claims Objection

Schedule 2 - Satisfied Claims

			ASSERTED CLAIMS			MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
21	Melanne Carpenter	173	5/22/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$14,232.69		General Unsecured	\$14,232.69
					Subtotal	\$27,882.69		Subtotal	\$14,232.69
Reason: Objection, priority unsecured portion of claim satisfied in full.									
22	Melony Appleby	639	5/22/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$4,365.38		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$4,365.38		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
23	Michael Cartwright	622	5/21/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$4,213.19		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$4,213.19		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
24	Michael Grzehowiak	630	6/2/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$3,923.10		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$3,923.10		Subtotal	\$0.00
Reason: Objection, satisfied in full.									
25	NM Taxation & Revenue Department	5843	3/2/2021	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$2,027.35		Priority Unsecured	\$0.00
					General Unsecured	\$209.00		General Unsecured	\$209.00
					Subtotal	\$2,236.35		Subtotal	\$209.00
Reason: Objection, priority unsecured portion of claim satisfied in full.									
26	Ohio Department of Taxation Bankruptcy Division	5626	10/28/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$136,408.92		Priority Unsecured	\$0.00
					General Unsecured	\$18,238.87		General Unsecured	\$18,238.87
					Subtotal	\$154,647.79		Subtotal	\$18,238.87
Reason: Objection, priority unsecured portion of claim satisfied in full.									

SCHEDULE 3

No Liability Claims

Thirteenth Omnibus Claims Objection
Schedule 3 - No Liability Claims

				ASSERTED CLAIMS		MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Beavers, Sandra M	2038	7/13/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ 1,500.00		Administrative	\$0.00
					Priority Unsecured	\$ -		Priority Unsecured	\$ -
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 1,500.00		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for severance. Debtors' books and records do not reflect amounts owed to claimant.				
2	Escambia County Tax Collector	5809	12/7/2020	Specialty Retailers, Inc.	Secured	\$ 5,257.82	Specialty Retailers, Inc.	Secured	\$0.00
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ -		Priority Unsecured	\$ -
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 5,257.82		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for taxes owed by Bealls Outlet Stores Inc., which is not a Debtor in these bankruptcy cases, and relates to a location at which the Debtors did not operate.				
3	Louisiana Department of Revenue	4295	7/31/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$0.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ -		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for taxes. Debtor's books and records indicate returns complete, balances paid and accounts closed.				
4	Louisiana Department of Revenue	5842	2/12/2021	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 11,383.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 11,383.00		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for taxes. Debtor's books and records indicate returns complete, balances paid and accounts closed.				

Thirteenth Omnibus Claims Objection
Schedule 3 - No Liability Claims

				ASSERTED CLAIMS			MODIFIED CLAIMS		
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
5	Massachusetts Department of Revenue	607	6/15/2020	Specialty Retailers, Inc.	Secured	\$ -	Specialty Retailers, Inc.	Secured	\$ -
					Administrative	\$ 2,000.00		Administrative	\$0.00
					Priority Unsecured	\$ -		Priority Unsecured	\$ -
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 2,000.00		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for taxes. Debtor's books and records indicate returns complete, balances paid and accounts closed.				
6	Sheneekua Thompson	1744	7/10/2020	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 13,650.00		Priority Unsecured	\$0.00
					General Unsecured	\$ 1,350.00		General Unsecured	\$0.00
					Subtotal	\$ 15,000.00		Subtotal	\$0.00
					Reason: Objection, no liability. Claim is for unpaid wages. Debtors' books and records do not reflect amounts owed to claimant.				