

**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 (CML)
	)	
Debtors.	)	(Jointly Administered)
	)	<b>Re: Docket No. 1297</b>

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO PLAN ADMINISTRATOR’S  
FOURTEENTH 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 Fourteenth Omnibus Objection to Certain Proofs of Claim* [Docket No. 1297] (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.

<sup>1</sup> 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)

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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*

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Daniel F.X. Geoghan

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Debtors.	)	(Jointly Administered)
	)	

**ORDER SUSTAINING PLAN ADMINISTRATOR’S FOURTEENTH  
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

(Insufficient Documentation Claims and Late-Filed Claim)

Upon the Plan Administrator’s fourteenth 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 notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefore,

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<sup>1</sup> 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).

<sup>2</sup> 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 Insufficient Documentation Claims listed on Schedule 1 attached hereto are hereby disallowed and expunged in their entirety.
3. The Late-Filed Claim listed on Schedule 2 hereto is hereby disallowed and expunged in its entirety.
4. 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 or Modified Claim set forth on Schedule 1 and Schedule 2 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.
5. 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.
6. 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.
7. Notwithstanding any Bankruptcy Rule or Local Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.

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

Houston, Texas

Dated: \_\_\_\_\_, 2025

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THE HONORABLE CHRISTOPHER M. LOPEZ  
UNITED STATES BANKRUPTCY JUDGE

**SCHEDULE 1**

**Insufficient Documentation Claims**

## Fourteenth Omnibus Claims Objection

### Schedule 1 - Insufficient Documentation 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		\$ -
					Priority Unsecured		\$ -		Priority Unsecured		\$ -
					General Unsecured		\$ -		General Unsecured		\$ -
					Subtotal		\$ 1,500.00		Subtotal		\$0.00
Reason: Objection, insufficient documentation. Claim is for severance. Claimant failed to provide sufficient documentation in support of the claim for reconciliation purposes. Debtors' books and records do not reflect amounts owed to claimant.											
2	Daaniel Mathis	5886	10/24/2023	Stage Stores, Inc.	Secured		\$ -		Secured		\$ -
					Administrative		\$ -		Administrative		\$ -
					Priority Unsecured		\$ 27,300.00		Priority Unsecured		\$0.00
					General Unsecured		\$ -		General Unsecured		\$ -
					Subtotal		\$ 27,300.00		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. Debtors' books and records do not reflect amounts owed to claimant.											



## Fourteenth Omnibus Claims Objection

## Schedule 2 - Late-Filed Claim

			ASSERTED CLAIMS			MODIFIED CLAIMS			
LINE	NAME	CLAIM #	DATE FILED	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	Dauniel Mathis	5886	10/24/2023	Stage Stores, Inc.	Secured	\$ -	Stage Stores, Inc.	Secured	\$ -
					Administrative	\$ -		Administrative	\$ -
					Priority Unsecured	\$ 27,300.00		Priority Unsecured	\$0.00
					General Unsecured	\$ -		General Unsecured	\$ -
					Subtotal	\$ 27,300.00		Subtotal	\$0.00
Reason: Objection, late-filed. Claim was filed on 10/24/2023, which was after the General Bar Date, 7/24/2020.									