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

In re:	)	Chapter 11
STAGE STORES, INC., *et al.*,[1]	)	Case No. 20-32564 (CML)
Debtors.	)	(Jointly Administered)

PLAN ADMINISTRATOR'S ELEVENTH MOTION FOR AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE UNDER THE CONFIRMED PLAN

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, 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 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION 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 MOTION 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 MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Steven Balasiano, in his capacity as the Plan Administrator of the above-captioned debtors and debtors in possession (collectively, the "Debtors"), states as follows in support of this motion (this "Motion"):

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

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Jurisdiction and Venue

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The Plan Administrator consents, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), to the entry of a final order by the Court.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 9006(b).

Background

A. General Background

4. 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.

5. 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.* (the "Disclosure Statement") [Docket No. 535].

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").

9. On the Effective Date, Steven Balasiano, in his capacity as the Plan Administrator, became the sole representative of the Debtors' estates for the purpose of, *inter alia*, reviewing

claims filed against the Debtors' estates and facilitating distributions to creditors in accordance with the Plan. *See* Plan Art.IV.D.

B. The Claims Objection Deadline

10. The Plan established March 21, 2021 as the initial deadline for any party in interest to object to any claim filed against the Debtors' estates (the "Claims Objection Deadline"). *See* Plan Art.I.A.22, Art.VII.E.

11. On February 9, 2021, the Court entered the *Order on Plan Administrator's Motion for and Order Extending (I) Objection Deadlines for Request for Administrative Claims; and (II) Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1024], which extended the Claims Objection Deadline to August 28, 2021.

12. On August 16, 2021, the Court entered the *Order on Plan Administrator's Expedited Second Motion for an Order Extending Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1071], which extended the Claims Objection Deadline to February 24, 2022.

13. On March 15, 2022, the Court entered the *Order on Plan Administrator's Third Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1134], which extended the Claims Objection Deadline to August 23, 2022.

14. On August 5, 2022, the Court entered the *Order on Plan Administrator's Fourth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1162], which extended the Claims Objection Deadline to February 19, 2023.

15. On March 3, 2023, the Court entered the *Order on Plan Administrator's Fifth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1171], which extended the Claims Objection Deadline to August 18, 2023, without prejudice to any future extension request.

16. On September 12, 2023, the Court entered the *Order on Plan Administrator's Sixth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1204], which extended the Claims Objection Deadline to February 14, 2024, without prejudice to any future extension request.

17. On January 17, 2024, the Court entered the *Order on Plan Administrator's Seventh Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1228], which extended the Claims Objection Deadline to August 12, 2024, without prejudice to any future extension request.

18. On July 15, 2024, the Court entered the *Order on Plan Administrator's Eighth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1266], which extended the Claims Objection Deadline to February 10, 2025, without prejudice to any future extension request.

19. On January 16, 2025, the Court entered the *Order on Plan Administrator's Ninth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1285], which extended the Claims Objection Deadline to August 11, 2025, without prejudice to any future extension request.

20. On July 28, 2025, the Court entered the *Order on Plan Administrator's Tenth Motion for an Order Extending the Claims Objection Deadline Under the Confirmed Plan* [Docket No. 1295], which extended the Claims Objection Deadline to February 9, 2026, without prejudice to any future extension request.

C. The Claims Reconciliation Process

21. Shortly after his appointment, the Plan Administrator began a comprehensive review of (i) the 30 applications for payment of administrative expenses that were filed against the Debtors' estates (the "Administrative Claims"), and (ii) the various proofs of claim (the "Proofs of Claim") filed against the Debtors' estates.

22. To date, the Plan Administrator has reviewed and consensually resolved all 30 of the Administrative Claims. In addition, the Plan Administrator has filed fourteen (14) claims objections to certain Proofs of Claim to date, eleven (11) non-substantive and three (3) substantive, all of which have been approved by the Court. *See* Docket Nos. 1124, 1125, 1138, 1139, 1141, 1142, 1143, 1144, 1185, 1186, 1211, 1212, 1303, 1304.

23. On July 7, 2022, the Plan Administrator filed the *Plan Administrator's Expedited Motion for Entry of an 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. 1157] (the "Omnibus Claims Objection Procedures Motion"), which sought to establish, among other things, certain procedures governing the filing of omnibus objections to Proofs of Claim and responses thereto. The Omnibus Claims Objection Procedures Motion was approved by an order of the Court dated July 29, 2022 [Docket No. 1161].

24. As of the date hereof, the Plan Administrator has identified other objectionable Proofs of Claim and intends to file further objections thereto shortly after the filing of this Motion.

Relief Requested

25. By this Motion, the Plan Administrator seeks entry of an Order, pursuant to section 105 of the Bankruptcy Code and Rule 9006(b) of the Bankruptcy Rules, extending the Claims Objection Deadline for a period of 180 days, through and including August 8, 2026, without prejudice to any further extension.

Basis for Relief

26. Since the Effective Date, the Plan Administrator has resolved, satisfied, or objected, as applicable, to several categories of claims, including, but not limited to, substantially all improperly asserted administrative expense claims, secured claims, and priority unsecured claims against the Debtors' estates. In connection with reconciling the Proofs of Claim, to date, the Plan

Administrator has filed fourteen (14) omnibus objections to approximately 1,510 Proofs of Claim. Further, this Court has approved a settlement agreement between the Plan Administrator and various claimants related to approximately 7,400 Proofs of Claim filed in connection with certain prepetition class actions and collective actions alleging that the Debtors failed to pay minimum wage and/or overtime under the Fair Labor Standards Act and analogous state law. *See* Docket No. 1299.

27. The Plan Administrator currently expects to make a small distribution on account of allowed general unsecured claims in line with the estimates provided in the Disclosure Statement.[2] In furtherance thereof, the Plan Administrator is currently reconciling remaining general unsecured claims, preparing further formal objections to certain Proofs of Claim, and is also working to consensually resolve certain Proofs of Claim with the respective claimants. The Plan Administrator expects to file a final series of objections to remaining general unsecured claims shortly after the filing of this Motion. After reconciliation of these remaining general unsecured claims and resolving any objections to the remaining Proofs of Claim, the Plan Administrator will be able to calculate and schedule final distributions to general unsecured creditors, complete the Debtors' wind-down, and ultimately close these bankruptcy cases. However, the Plan Administrator requires additional time to prepare and file these claims objections. The Plan Administrator therefore requests an extension of the Claims Objection Deadline to August 8, 2026, without prejudice to any request for a further extension.

28. The Plan Administrator believes that the requested extension of the Claims Objection Deadline is in the best interests of the estates and is appropriate under the circumstances, as it will provide the Plan Administrator the necessary time to review and reconcile the Proofs of Claim asserted against the Debtors' estates for the benefit of their creditors and stakeholders. The

[2] The Disclosure Statement estimated distributions on account of general unsecured claims of between 0% and 6%. Disclosure Statement at 7.

requested extension will not prejudice any creditor or other party in interest. Without a further extension, the Plan Administrator may forfeit valuable potential objections to the Proofs of Claim that could be brought for the benefit of the Debtors' creditors. As such, a further extension will preserve assets of the estates by ensuring that all proper claims objections are asserted.

29. Section 105(a) of the Bankruptcy Code provides that "the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Further, Bankruptcy Rule 9006(b) provides that the Court may "for cause shown at any time in its discretion" extend a deadline "if the request therefore is made before the expiration" of such deadline." Fed. R. Bankr. P. 9006(b)(1). Further, the Plan expressly defines the Claims Objection Deadline to include the latest of, among other things, "such other period of limitation as may be specifically fixed by the Debtors or the Wind-Down Debtors, as applicable, and by an order of the Bankruptcy Court for objecting to Claims." Plan Article I.A.22. Accordingly, the relief requested is proper and in the best interests of the Debtors' estates.

Notice

30. The Plan Administrator will provide notice of this Motion to: (a) the U.S. Trustee for the Southern District of Texas; and (b) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Plan Administrator submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Plan Administrator requests that the Court enter an order granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: January 8, 2026

/s/ Aaron Davidson

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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 January 8, 2026, 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/ Aaron Davidson
Aaron Davidson

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

In re:	)	Chapter 11
STAGE STORES, INC., *et al.*,[1]	)	Case No. 20-32564 (CML)
Debtors.	)	(Jointly Administered)
	)	**Re: Docket No.:**

ORDER APPROVING PLAN ADMINISTRATOR'S ELEVENTH MOTION FOR AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE UNDER THE CONFIRMED PLAN

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

[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 but not otherwise defined herein have the meanings ascribed to them in the Motion.

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

1. The Claims Objection Deadline pursuant to the Plan and the Confirmation Order is hereby extended to August 8, 2026, without prejudice to any request for a further extension.

2. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) are satisfied by such notice.

3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

4. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Houston, Texas
Dated: _____, 2026

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE