Docket #1338 Date Filed: 06/01/2026

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUN 01 2026

Nathan Ochsner, Clerk of Court

In re:

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

Debtors

Chapter 11

Case No. 20-32564 (CML)

CREDITOR'S RESPONSE TO DEBTOR'S OBJECTION TO PROOF OF CLAIM NO. 4077 BASED ON ALLEGED UNTIMELINESS

Creditor **CONTEMPO CARD COMPANY, INC.** ("Creditor"), by and through the undersigned, respectfully submits this Response to the Debtor's Objection to Proof of Claim No. 4077 (the "Objection"), and states as follows:

I. Introduction

The Debtor seeks disallowance of Creditor's claim solely on the basis that it was filed after the bar date of **Friday, July 24, 2020**. The claim was filed on **Monday, July 27, 2020**, the next business day following the bar date. Under the circumstances, and consistent with the equitable principles governing Chapter 11 cases, the claim should be deemed timely and allowed.

II. Relevant Background

1. The Court established **July 24, 2020 (Friday)** as the general bar date for filing proofs of claim.
2. Creditor's Proof of Claim was filed on **July 27, 2020 (Monday)**.
3. The filing occurred **immediately on the next business day**, following circumstances that prevented filing on the bar date itself.
4. The Debtor now objects to the claim as untimely.

III. Argument

A. Filing on the Next Business Day Should Be Deemed Timely Under the Circumstances

Although the bar date fell on Friday, July 24, 2020, Creditor filed its claim on the next business day, Monday, July 27, 2020. Courts in Chapter 11 cases routinely apply equitable principles when evaluating claims filed shortly after the bar date, particularly where the creditor acted diligently and the delay is minimal.

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The one business day delay here was not the result of neglect or disregard for the Court's order. Creditor acted promptly and in good faith by filing at the first available opportunity.

B. No Prejudice to the Debtor or the Estate

Allowing the claim does not prejudice the Debtor, other creditors, or the administration of the estate. The claim was filed at the very outset of the claims-reconciliation process, and the Debtor has had full notice of the claim and its basis.

C. Equitable Considerations Favor Allowance of the Claim

Chapter 11 is fundamentally an equitable proceeding. Disallowing a claim based on a brief, good-faith delay—particularly one measured in a single business day—would elevate form over substance and undermine the fair treatment of creditors.

Courts routinely decline to impose the harsh penalty of disallowance where, as here:

- the delay is minimal,
- the creditor acted diligently,
- there is no prejudice to the estate, and
- the claim is otherwise valid.

IV. Conclusion

For the foregoing reasons, Creditor respectfully requests that the Court:

1. **Overrule** the Debtor's Objection;
2. **Deem Proof of Claim No. 4077 timely filed**; and
3. **Allow the claim in full**; and grant such other and further relief as the Court deems just and proper.

V. Notice

Notice of this response has been provided to the Debtor's Attorney.

Dated: 05/28/2026

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