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)

CERTIFICATE OF COUNSEL REGARDING STIPULATION AND AGREED ORDER DISALLOWING AND EXPUNGING CLAIM NO. 2079 FILED BY NIKE USA, INC.

The undersigned counsel for Steven Balasiano, in his capacity as Plan Administrator of Stage Stores, Inc. and Specialty Retailers, Inc. (together, the "Debtors") hereby certifies as follows:

1. 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 (the "Chapter 11 Cases").

2. On June 18, 2020, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Request for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Date, and (V) Granting Related Relief* [Docket No. 478]. Among other things, the Bar Date Order established (i) July 24, 2020 at 5:00 p.m. (CT) as the general deadline for all persons and entities, other than governmental units, to file prepetition claims against the Debtors' estates, including claims arising under section 503(b)(9) of the Bankruptcy Code, (ii) November 6, 2020 at

[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).

5:00 p.m. (CT) as the deadline for all governmental units to file prepetition claims against the Debtors' estates, or (iii) 5:00 p.m. (CT) on the date that is thirty (30) days following entry of the order approving the Debtors' rejection of the applicable executory contract or unexpired lease as the deadline to file rejection damages claims against the Debtors' estates.

3. On July 14, 2020, Nike USA, Inc. ("Nike", and with the Plan Administrator, the "Parties") filed a proof of claim against Specialty Retailers, Inc. in the alleged amount of $3,587,369.92 ("Claim No. 2077").

4. On July 14, 2020, Nike also filed a proof of claim against Stage Stores, Inc. in the alleged amount of $3,587,369.92 ("Claim No. 2079").

5. 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").

6. 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].

7. The effective date of the Plan occurred on October 30, 2020 [Docket No. 898] (the "Effective Date").

8. On the Effective Date, Steven Balasiano, in his capacity as Plan Administrator, became the sole representative of the Debtors' estates for the purpose of, *inter alia,* making or facilitating distributions contemplated under the Plan. *See* Plan Art.IV.D.

9. The Parties have determined that Claim No. 2079 is a duplicative claim of Claim No. 2077. Based upon the foregoing and as a result of good faith negotiations, the Parties have entered into that certain *Stipulation and Agreed Order Disallowing and Expunging Claim No. 2079 Filed By Nike USA, Inc.* dated August 17, 2026 (the "Stipulation and Order"). A copy of the Stipulation and Order is attached hereto as **Exhibit 1**. Subject to the Court's approval, the Stipulation and Order provides, *inter*

alia, that (i) Claim No. 2079 asserted by Nike against Stage Stores, Inc. shall be disallowed and expunged in its entirety, and (ii) Claim No. 2077 asserted by Nike against Specialty Retailers, Inc. shall remain on the claims register and is otherwise unaffected by the terms of the Stipulation and Order. The Plan Administrator believes that the approval and entry of the Stipulation and Order is in the best interests of the Debtors, their estates, their creditors and other parties-in-interest in these Chapter 11 Cases.

10. The Plan Administrator respectfully requests that the Court enter the attached Stipulation and Order at the earliest convenience of the Court.

Dated: August 17, 2026

Respectfully submitted,

/s/ Daniel F.X. Geoghan

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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 August 17, 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/ Daniel F.X. Geoghan
Daniel F.X. Geoghan

Exhibit 1

Stipulation and Order

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)

STIPULATION AND AGREED ORDER DISALLOWING AND EXPUNGING CLAIM NO. 2079 FILED BY NIKE USA, INC.

This stipulation and agreed order (this "Stipulation") is entered into by and between Steven Balasiano, solely in his capacity as Plan Administrator (the "Plan Administrator") under the confirmed chapter 11 plan of Stage Stores, Inc. and its affiliated debtors (collectively, the "Debtors"), and Nike USA, Inc. ("Nike," and together with the Plan Administrator, the "Parties").

RECITALS

WHEREAS, on May 10, 2020 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the "Court"), and such cases are being jointly administered under Case No. 20-32564 (DRJ);

WHEREAS, on July 14, 2020, Nike timely filed (i) Proof of Claim No. 2077 ("Claim No. 2077") in the amount of $3,587,369.92 against Specialty Retailers, Inc. (Debtor No. 20-32565), and (ii) Proof of Claim No. 2079 ("Claim No. 2079"), asserting the same amount and liability, against Stage Stores, Inc. (Debtor No. 20-32564);

[1] The 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).

WHEREAS, based upon the Plan Administrator's review and representations to Nike, Nike and the Plan Administrator have determined that Claim No. 2079 is a duplicative claim of Claim No. 2077 as Claim No. 2077 was filed against the debtor that incurred the obligation owed to Nike, Specialty Retailers, Inc.;

NOW, THEREFORE, UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS STIPULATED AND AGREED AS FOLLOWS:

1. Claim No. 2079 asserted by Nike against Stage Stores, Inc. is disallowed and expunged in its entirety.

2. Claim No. 2077 shall remain on the claims register and is unaffected by this Stipulation.

3. Nothing in this Stipulation shall be deemed or construed as an allowance or disallowance of Claim No. 2077. The Parties reserve all rights with respect to Claim No. 2077.

4. The claims, noticing, and solicitation agent, Kurtzman Carson Consultants, LLC dba Verita Global, as the Court-appointed agent in these chapter 11 cases, is authorized and directed to update the claims register to reflect the terms of this Stipulation.

5. Each Party represents and warrants that it is duly authorized to execute and deliver this Stipulation and to take all actions necessary or appropriate to effectuate its terms.

6. This Stipulation is subject to Court approval and is effective and enforceable only upon entry of an Order of the Court approving this Stipulation.

7. This Stipulation shall not be modified, altered, amended, or vacated without written consent of the Parties and further Order of this Court.

8. This Stipulation may be executed in multiple counterparts, any of which may be transmitted by facsimile or electronic mail, and each of which will be deemed an original, but all

of which together will constitute a single Stipulation.

9. The Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Stipulation.

Dated: _____ __, 2026

_____
CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO THIS 17 DAY OF August, 2026

/s/ *Daniel F.X. Geoghan*
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Counsel to Steven Balasiano, in his capacity as Plan Administrator of Stage Stores, Inc., et al.

NIKE USA, INC.

By: _____
Name: Genna Clark
Title: Account Management Lead, Order to Cash