
UNITED STATES
BANKRUPTCY COURT

SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: §
§
STAGE STORES, INC. and § Bankr. Case No. 20-32564 (DRJ)
§ Chapter 11
SPECIALTY RETAILERS, INC., § Jointly Administered
§
§
*Debtors.*¹ §

**PLAINTIFF AMY STUMPF'S LIMITED OBJECTION TO
CONFIRMATION OF THE PLAN**

Amy Stumpf, individually and on behalf of all others similarly situated, objects to confirmation of the Joint Amended Chapter 11 Plan of Stage Stores, Inc. & Specialty Retailers, Inc. (Doc. 536) for the following reasons:

1. Stumpf filed a class action adversary proceeding against the debtors alleging violations of the Worker Adjustment Retraining and Notification Act, 29 U.S.C. §§ 2101-2109 (“WARN Act”). *See generally, Stumpf v. Stage Stores, Inc.*, No. 20-03303 (Bankr. S.D. Tex. filed Jul. 16, 2020).

2. As she explained in her complaint, which is adopted by reference, Stumpf's claims and the claims of the putative class members are entitled to first

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). The debtors' headquarters is: 2425 West Loop South, Houston, Texas 77027-4205.



priority post-petition administrative expense status under 11 U.S.C. § 503(b)(1)(A) or, alternatively, wage priority status under 11 U.S.C. §§ 507(a)(4)-(5) up to the \$13,650 priority wage cap, with the balance, if any, as a general unsecured claim.

3. She therefore objects to confirmation of Joint Amended Chapter 11 Plan of Stage Stores, Inc. & Specialty Retailers, Inc. (Doc. 536) to the extent that it purports to prioritize her claims or the claims of the putative class members differently.

Respectfully Submitted,

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ATTORNEYS FOR AMY STUMPF

CERTIFICATE OF SERVICE

I certify that a copy of this document was served via CM/ECF system for the United States Bankruptcy Court for the Southern District of Texas on all parties or their attorney(s) of record who are registered to receive electronic notices on the date below.

August 13, 2020

Date



Melissa Moore