## IN THE UNITED STATES BANRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS (HOUSTON)

IN RE:

\$
STAGE STORES, INC.

\$
CASE NO. 20-32564
\$
CHAPTER 11

DEBTORS

EBTORS

## NOTICE OF APPEARANCE UNDER FEDERAL BANKRUPTCY RULE 9010(b) COMBINED WITH REQUEST FOR NOTICE OF ALL MATTERS

PLEASE TAKE NOTICE, that the undersigned law firm, Germer PLLC hereby appears in the above-captioned action on behalf of **ACS Louisa Place KY, LLC** a creditor of Debtor, ("Creditor") and pursuant to Title 11, United States Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon their attorney of record, at the following address and by email to:

GARY W. COKER Email: gcoker@germer.com Germer PLLC P.O. Box 4915 Beaumont, Texas 77704

PLEASE TAKE FURTHER NOTICE, that this request includes but is not limited to all notices, copies and pleadings referred to in Title 11, United States Code and the Federal Bankruptcy Rules, including without limitation notices of any orders, motions, demands, complaints, petitions, pleadings or requests, applications and any other documents brought before this court in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed with regard to this case and any other proceedings herein which affect or seek to affect, in any way, the debtors or property or proceeds in which the debtors may claim or have an interest. Further, this request specifically includes copies of all disclosure statements to be submitted prior to approval and any and all reorganization plans or liquidation.

PLEASE TAKE FURTHER NOTICE that this Notice is not intended to be, and shall not constitute, a consent by Creditor to the Bankruptcy Court's subject matter jurisdiction, personal

jurisdiction, or core jurisdiction.

PLEASE TAKE FURTHER NOTICE that neither this Notice, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with this case is intended to waive (i) the right to have final orders in non-core matters entered only after <u>de novo</u> review by a District Court Judge, (ii) the right to trial by jury in any case, controversy, or proceeding, (iii) the right to have the reference withdrawn by the District Court is any matter subject to mandatory or discretionary withdrawal, and (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which Creditor is, or may be entitled, under agreements, in law or in equity, are expressly reserved.

PLEASE TAKE FURTHER NOTICE that request is also made that the undersigned be added to any official service list for notice of all contested matters, adversary proceedings or any other proceedings in this case.

Dated this 15<sup>th</sup> day of September, 2020.

Respectfully submitted,

BY: /s/ Gary W. Coker

GARY W. COKER State Bar No. 04526000

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Beaumont, Texas 77704

(409) 654-6700

(409) 835-2115 (fax)

gcoker@germer.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date, a true and correct copy of the above and foregoing document shall be served via electronic means, if available, otherwise by regular, first class or certified mail, to the addresses listed below:

Debtor:

Stage Stores, Inc. 2425 West Loop South Houston, Texas 77027

Specialty Retailers, Inc 2425 West Loop South Houston, Texas 77027

Debtor's Attorneys:

Jackson Walker LLP 1401 McKinney Street, Suite 1900 Houston, Texas 77010 Matthew D. Cavenaugh

Email: mcavenaugh@jw.com

Veronica Ann Polnick Email: <a href="mailto:vpolnick@jw.com">vpolnick@jw.com</a>

Jennifer F. Wertz

Email: jwertz@jw.com

U.S. Trustee Office of US Trustee 515 Rusk Ave., Ste 3516 Houston, Texas 77002

SIGNED AND DONE on this 15th day of September, 2020.

/s/ Gary W. Coker GARY W. COKER