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

In re: Chapter 11

STAGE STORES, INC., et al., Case No. 20-32564-DRJ

Debtors.

(Jointly Administered)

STEVEN BALASIANO, AS PLAN ADMINISTRATOR OF STAGE STORES, INC., et al.,

ADV. PRO. NO. 22-03142

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD'S LONDON – BRIT SYNDICATE 2987 AND BRIT SYNDICATE 2988, EVEREST INDEMNITY INSURANCE COMPANY, and QBE SPECIALTY INSURANCE COMPANY

Defendants.

#### CERTIFICATE OF INTERESTED PARTIES AND DISCLOSURE STATEMENT

According to Federal Bankruptcy Rule of Procedure 7007.1 and Federal Rule of Civil Procedure 7.1, Defendants Those Certain Underwriters at Lloyd's, London subscribing to Policy Number PD-10921-00 — Brit Syndicate 2987 and Brit Syndicate 2988, Everest Indemnity Insurance Company, and QBE Specialty Insurance Company file their Certificate of Interested Parties and Disclosure Statement and states:

## 1. Those Certain Underwriters at Lloyd's, London subscribing to Policy Number PD-10921-00, Brit Syndicate 2987

Lloyd's of London Syndicate 2987 ("Syndicate 2987") is an unincorporated association, and Brit UW Ltd. is the corporate member of Syndicate 2987. Brit Ltd. is the direct parent and sole (100%) owner of Brit UW Ltd. Fairfax Financial Holdings, Ltd. is the owner of more than 10% of Brit Ltd. Ontario Municipal Employees Retirement System ("OMERS") is the owner of



more than 10% of Brit, Ltd. No publicly held company owns more than 10% of Fairfax Financial Holdings, Ltd., or OMERS.

### 2. Those Certain Underwriters at Lloyd's, London subscribing to Policy Number PD-10921-00, Brit Syndicate 2988

Lloyd's of London Syndicate 2988 ("Syndicate 2988") is an unincorporated association, whose principal place of business is in London, England. Defendant Insurer Syndicate 2988 is diligently identifying all information required to be disclosed under Rule 7007.1 and will supplement this disclosure as soon as possible.

### 3. **QBE Specialty Insurance Company**

QBE Specialty Insurance Company is a wholly owned subsidiary of QBE Holdings, Inc., which is a wholly owned and indirect subsidiary of QBE Insurance Group Limited, which is publicly traded on the Australian Securities Exchange. No publicly held corporation owns 10% or more of the stock of QBE Specialty Insurance Company.

#### 4. Everest Indemnity Insurance Company

Everest Indemnity Insurance Company is a wholly owned subsidiary of Everest Reinsurance Company, which is a wholly owned subsidiary of Everest Reinsurance Holdings, Inc., which is a wholly owned subsidiary of Everest Underwriting Group (Ireland) Limited, which is a wholly owned subsidiary of Everest Re Group, Ltd., a publicly traded company.

Respectfully submitted,

/s/ Jerrod L. Rinehart

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#### ATTORNEYS FOR DEFENDANTS

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was sent to all parties and counsel of record, pursuant to the Federal Rules of Civil Procedure, addressed as follows:

#### Via Electronic Filing

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#### **ATTORNEYS FOR PLAINTIFFS**

Dated: June 20, 2022

Jerrod L. Rinehart

Carter L. Ferguson Jerrod L. Rinehart