

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

In re:)	
)	Chapter 11
)	
STAGE STORES, INC., <i>et al.</i> , ¹)	Case No. 20-32564 (DRJ)
)	(Jointly Administered)
Debtors.)	
)	Re: Docket No. 1250

NOTICE OF STANDING AND INDISPENSABLE PARTY STATUS

Steven Balasiano, in his capacity as the Plan Administrator (the “Plan Administrator”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby files this *Notice of Standing and Indispensable Party Status* (this “Notice”) and respectfully states 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.
2. 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”).
3. 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]. The effective date of the Plan occurred on October 30, 2020 [Docket No. 898] (the “Effective Date”).

¹ The Wind-Down 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).



4. On the Effective Date, Steven Balasiano was appointed the Plan Administrator and became the sole representative of the Debtors' estates. As the Plan Administrator, he is empowered to act on behalf of the Debtors in all capacities, including for the purpose of, *inter alia*, reviewing claims filed against the Debtors' estates and facilitating distributions to creditors in accordance with the Plan. *See* Plan Art.IV.D.

5. On March 26, 2024, the Court entered the *Order Requiring Any Party-in-Interest Who Asserts Standing or Indispensable Party Status to File a Notice Stating a Basis for Indispensable Party Status or Standing in Connection with Jackson Walker LLP Fee Matters* [Docket No. 1250] (the "Notice Order") requiring any party-in-interest claiming to be an indispensable party or otherwise claiming to have standing to seek that Jackson Walker LLP return compensation to the bankruptcy estates to file a notice with the Court asserting the basis for such indispensable party status or standing no later than April 15, 2024.

6. The Plan Administrator hereby files this Notice to assert that he is an indispensable party pursuant to Fed. R. Bankr. P. 7019 in this matter and that he has standing to be heard in connection with the disgorgement motions filed by the United States Trustee.

7. The basis for the assertion of standing or indispensable party status is as follows:

- (a) The Plan Administrator has standing by virtue of his role as the sole representative of the Debtors' estates under the Plan; and
- (b) These chapter 11 cases are not yet closed and, in the event Jackson Walker LLP ultimately returns funds to the Debtors' estates, such funds would have

to be paid to the Plan Administrator, on behalf of the Debtors' estates, for disbursement in accordance with the Plan.

8. For the reasons stated herein, the Plan Administrator possesses standing to be heard on the disgorgement motions and is an indispensable party in this matter pursuant to Fed. R. Bankr. P. 7019.

Dated: April 12, 2024

/s/ Daniel F. X. Geoghan

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Plan Administrator of Stage Stores, Inc. and
Specialty Retailers, Inc.*

CERTIFICATE OF SERVICE

I certify that on April 12, 2024, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court, which will serve all parties who have appeared in this matter via the Court's CM/ECF system.

/s/ Daniel F. X. Geoghan

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