IN THE UNITED STATES BANKRUPTCY COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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| Jane Doe  Plaintiff, Debtor  v.  U.S. Department of Education, Educational Credit Management Corporation, Sallie Mae, Apollo Education Group Inc., Navient, University Accounting Service.  Defendants, Creditors | )  )  )  )  )  ) )  )  ) ) | Bankruptcy Judge  Honorable Dave Trout  Chapter 7  Trustee Dan Smith  Bankr. No. 11-67894  Adv. Proc. No. 11-45321 |

# ADVERSARY COMPLAINT

1. **NOW COMES,** Jane Doe, debtor, Plaintiff. Pursuant to 11 U.S.C. § 523(a)(8), and Federal Rule of Bankruptcy Procedure 7052, and 28 U.S.C. § 1334 (a) and 157(a) I am requesting that my student loans be discharged. I reside at 1234 Cat Street, Wood Park, PA 15003, in the county of Park Woods, in the State of Pennsylvania

Jurisdiction

1. The court has Jurisdiction under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties.
2. The court also has Jurisdiction under Federal Rule of Bankruptcy Procedure 7052, and 28 U.S.C. § 1334 (a) and 157(a).
3. This court has the right to grant Plaintiff the relief that Plaintiff request or what the court determines to be appropriate.

PARTIES

Plaintiff

Jane Doe

1234 Cat Street

Wood Park, PA 15003

(504) 555-1212

Defendant(s)

U.S. Department of Education

Department of Education Building

400 Maryland Ave, SW

Washington, DC 20202

1-800-433-3243

Educational Credit Management Corporation

2, 1 Imation Pl,

Oakdale, MN 55128

Sallie Mae

P.O. Box 3319

Wilmington DE 19804-4319

Apollo Education Group Inc.

4025 S. Riverpoint Parkway

Phoenix, AZ 85040 USA

800-990-2765

Navient

P.O. Box 9750

Wilkes-Barre, PA 18773-9750

800-722-1300

University Accounting Service

PO Box 918

Brookfield, WI 53008-0918

Statement of Claim

1. The debtor claims the following.
2. The debtor cannot maintain a minimal standard of living for himself and his dependents if forced to repay debtor’s student loans.
3. The debtor did not willfully or negligently cause this situation.
4. This is based on the debtor’s current and future income, current expenses, employment history, medical condition, disability, education attainment, and family structure.
5. Additional circumstances exist indicating that this state of affairs is likely to persist for a significant portion of the repayment period of the student loans.
6. The debtor has made good faith efforts to repay the loans.
7. The debtor meets the requirements of undue hardship as stated in 11 U.S.C. § 523(a)(8).

Relief

1. I am requesting that all my educational or student loans be discharged.

Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Jane Doe

1234 Cat Street

Wood Park, PA 15003

(504) 555-1212

Email: Janedoe @gmail.com

Debtor, Plaintiff signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: July 23, 2016