

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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

MOTION TO REOPEN DISCOVERY

NOW COMES, Jane Doe, Debtor, Plaintiff, pro se, requesting to REOPEN DISCOVERY.

On April 22, 2016, Plaintiff received an update from his doctor relating to his medical condition or disability that is relevant to his case.

Plaintiff did not know until May 21, 2016 if it was possible for Plaintiff to attain a new or updated diagnosis regarding Plaintiff's disability or medical condition.

This is because Plaintiff could not afford to pay for it on his own and Plaintiff's insurance would not pay for it until now.

Plaintiff only decided to attain an updated or new diagnosis because Defendants has stated that the diagnosis Plaintiff currently have is to old.

Wherefore,

I am requesting to reopen discovery.

Jane Doe
1234 Cat Street
Wood Park, PA 15003
(504) 555-1212
Email: Janedoe@gmail.com
Debtor, Plaintiff signature: _____

Date: July 23, 2016

CERTIFICATE OF SERVICE

I Jane Doe, Debtor, Plaintiff, hereby certify that a true and correct copy of **MOTION TO REOPEN DISCOVERY** and the **NOTICE OF MOTION TO REOPEN DISCOVERY**, and the **NOTICE OF FILING OF MOTION TO REOPEN DISCOVERY** and the **ORDER** were served on Creditors, Defendants at

To:

Lawyer for the U.S. Department of Education (Name and address)

Lawyer for the Educational Credit Management Corporation (Name and address)

by first class mail, postage pre-paid, and depositing the same in the U.S. Mail at 123 Wood Blvd, Wood Park, PA 15003 Mailed on July 23, 2016. 4:00 pm.

Jane Doe
1234 Cat Street
Wood Park, PA 15003
(504) 555-1212
Email: Janedoe@gmail.com
Debtor, Plaintiff signature: _____
Date: July 23, 2016