

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

Jane Doe	)	
	)	
Plaintiff, Debtor	)	Bankruptcy Judge
	)	Honorable Dave Trout
v.	)	Chapter 7
	)	
	)	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	—	

**PLAINTIFF’S RESPONSE BRIEF DEFENDANTS’ MOTION TO DISMISS**

1. **NOW COMES, Jane Doe, debtor**, Plaintiff, RESPONSE BRIEF to Defendants’ motion to dismiss.
  
2. My case should not be dismissed because the following issues have not been resolved.
  
3. Based on Plaintiff’s medical history, employment history, Neuropsychological Assessment my student loans should be discharged.
  
4. My medical condition or Neuropsychological Assessment which is \_\_\_\_\_, affects my ability in the areas of speech, hearing, concentration, focus, reading, writing, attention, processing speed, and problem solving skills. Please see attachment for copies of supporting documents.
  
5. This has caused me to be unable to attain employment that allowed me to pay the monthly payments on my student loans.
  
6. Attached is a list of the jobs I applied to, with dates applied, job titles, and job descriptions.

7. Also attached is a list of the jobs I worked, with dates worked, the job titles, and the job descriptions.

8. Because of my medical condition, learning disability I have never been able to maintain employment that would pay enough for me to pay the monthly payments on my loans.

9. The articles from LD OnLine support my claims.

### EXHIBITS

Please find attached the following exhibits.

Exhibits 1, Medical records

Exhibits 2, Employment history

Exhibits 3, Neuropsychological Assessment,

Exhibits 4, Articles from these online periodicals

Wherefore,

10. Plaintiff is request that his case not be dismissed.

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 **RESPONSE BRIEF** was served on 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