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The Honorable Beth Andrus
Hearing: July 8, 2016
Time: 9:00 am

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY AT SEATTLE

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2005-3, A DELAWARE
STATUTORY TRUST

No. 15-2-18048-7 SEA

Plaintiff,

DECLARATION OF ISABEL DRUMOND IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT

v.

ISABEL C. DRUMOND and
DAVID K. ROBINS,

Defendant(s).

David K. Robins

Cross Plaintiff,

v.

ISABEL DRUMOND, individually and the
marital community of ISABEL DRUMOND
and JOHN DOE DRUMOND,

Cross Defendants.

I, Isabel Drumond, declare:

1. I am a defendant in this lawsuit, am knowledgeable regarding the facts in this
Declaration, and am competent to testify to the same.

1 2. In June and July 2015, I was served with seven separate lawsuits by different
2 National Collegiate trusts, including the complaint underlying this matter, which was dated
3 June 10, 2015 and filed with this Court on July 27, 2015.

4 3. On July 25, 2015, after receiving service of the Summons and Complaint, I sent
5 validation letters to the Plaintiff's attorneys requesting documentation to support the numerous
6 lawsuits with which I had been served, and requesting further information regarding both the
7 debts and the Plaintiff, since I no idea who the Plaintiff was or what the debts were. See
8 Exhibit A.

9 4. In response to my validation letters for two the alleged loans, I received the filed
10 summons and complaint and a Motion for Default Judgment dated August 6, 2015 for the two
11 lawsuits here. I subsequently retained an attorney and began to formally contest the matters.
12

13 5. I have no knowledge of Plaintiff National Collegiate Student Loan Trust 2005-3
14 ("NCSLT"), and have not received any billing statements from either entity. I do not recall
15 receiving any collection calls, notice of default or any other correspondence from Plaintiff
16 either.

17 6. After reviewing the discovery from Plaintiff, I still do not have any recollection
18 of signing or reviewing the purported application, including the disclosures, and I do not
19 believe that I owe any debt obligation to continues to dispute any debt obligation owed to
20 NCSLT.
21

22 7. Lastly, I married my husband on July 12, 2007 and everything I own is
23 community property. I do not have any separate property.

24 EXECUTED THIS 27th day of June 2016.

25 /s/ Isabel Drumond
Isabel Drumond

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EXHIBIT A

DECLARATION OF ISABEL DRUMOND IN SUPPORT OF
SUMMARY JUDGMENT - 3

HENRY, DEGRAFF & MCCORMICK, PS
1833 N 105th St, Ste 203
Seattle, Washington 98133
206-330-0595 – Main
206-400-7609 - Fax

Isabel Drumond

3108 NW 91th St
Seattle, WA 98117

July 25th, 2015

Patenaude & Felix, APC
Attn: Matthew Cheung
19401 40th Ave West
Suite 280
Lynnwood, WA 98036

RE: PF File# 15-16510
National Collegiate Student Loan Trust 2004-1, Statutory Trust vs. Isabel C Drumond and David K Robins

To Whom It May Concern:

Be advised this is not a refusal to pay, but a notice that your claim is disputed and validation is requested. Under the Fair Debt Collection Practices Act (FDCPA), I have the right to request validation of the debt you say I owe you. I am requesting proof that I am indeed the party you are asking to pay this debt, and there is some contractual obligation that is binding on me to pay this debt.

I have received numerous lawsuits from you and I have no idea what they are for and what debt you are allegedly collecting on.

This is NOT a request for "verification" or proof of my mailing address, but a request for VALIDATION made pursuant to 15 USC 1692g Sec. 809 (b) of the FDCPA. I respectfully request that your offices provide me with competent evidence that I have any legal obligation to pay you.

I am requesting the following information concerning the lawsuit I was served with.

Please provide the following:

- The original agreement that the lawsuit is based on.
- Any Agreement that bears the signature of the alleged that says I agreed to pay the creditor who has sued me.
- Any billings, statements and/or proof concerning this debt.
- Any Alleged account number for this debt
- Original Amount of the alleged debt.

RECEIVED
JUL 27 2015
BY: 

Isabel Drumond

3108 NW 91th St
Seattle, WA 98117

- Date this alleged debt became payable.
- Date of original charge off or delinquency.
- Verification that this debt was assigned or sold to a debt collector.
- Complete accounting of alleged debt.
- Proof of any payments you have credited to this alleged debt.

Your Truly,

A handwritten signature in blue ink that reads "Isabel Drumond". The signature is written in a cursive style with a horizontal line underlining the name.