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10
11 **UNITED STATES BANKRUPTCY COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13 **Santa Barbara Division**

14 In re:

15 VICTORIA C. WRIGHT,
16
17 Debtor.

18 Bankr. Case No.: ND:15-bk-10877-PC
19 Chapter 7

20 VICTORIA C. WRIGHT,
21
22 Plaintiff,

23 Adv. Proc. No.: ND:16-ap-01016-PC

24 v.

25 NATIONAL COLLEGIATE STUDENT
26 LOAN Trust 2006-3, NAVIENT
27 CORPORATION, U.S. DEPARTMENT
28 OF EDUCATION, and DOES 1-10,

Defendants.

**STIPULATION FOR DISCHARGE
OF EDUCATIONAL LOAN DEBT
BETWEEN PLAINTIFF AND
NAVIENT SOLUTIONS, INC. AND FOR
DISMISSAL OF NAVIENT
CORPORATION AS A DEFENDANT IN
THIS ADVERSARY PROCEEDING**

29 Plaintiff, Victoria C. Wright ("Plaintiff"), and Navient Solutions, Inc. ("Navient"), hereby
30 stipulate as follows:
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33
34

1 1. On April 28, 2015, Plaintiff filed a voluntary petition for relief under Chapter 7 of
2 the United States Bankruptcy Code, and a discharge of eligible debts was entered on August 18,
3 2015.

4
5 2. On January 18, 2016, Plaintiff filed a Complaint, naming "Navient Corporation"
6 as one of the Defendants, seeking a discharge of educational loan debt under
7 11 U.S.C. §523(a)(8).

8 3. Plaintiff is indebted to Navient pursuant to the applicable terms of four (4)
9 educational loan Promissory Notes ("Promissory Notes") executed by Plaintiff to obtain
10 educational loans ("Educational Loans") with approximate balances, as of the date of the filing
11 of this adversary proceeding, as follows:

12
13 a. one (1) Educational Loan disbursed October 5, 2006, with a balance,
14 including principal, interest and fees, totaling \$19,241.67;

15 b. one (1) Educational Loan disbursed December 21, 2006, with a balance,
16 including principal, interest and fees, totaling \$48,651.79;

17 c. one (1) Educational Loan disbursed August 16, 2007, with a balance,
18 including principal, interest and fees, totaling \$40,314.11; and

19 d. one (1) Educational Loan disbursed December 7, 2007, with a balance,
20 including principal, interest and fees, totaling \$11,592.30.

21 4. As of the date of the filing of this adversary proceeding, there was a balance due
22 and owing on the Educational Loans evidenced by the Promissory Notes, including principal,
23 interest and fees, in the aggregate amount of \$119,799.87.

24 5. The parties agree to a discharge of Plaintiff's liability on the debt due Navient,
25 owing on the Educational Loans evidenced by the Promissory Notes referenced herein above, as
26 included within the general discharge entered in Plaintiff's main bankruptcy case on August 18,
27 2015; upon approval of this Stipulation by the court, the Plaintiff's debt to Navient, referenced
28

1 herein, will be included within the general discharge entered in Plaintiff's main bankruptcy case.
2 and is therefore, discharged.

3 6. The parties agree to a dismissal of Navient Corporation as a Defendant in this
4 adversary proceeding, subject to the terms of this Stipulation, upon approval of this Stipulation
5 by the court.
6

7 7. This Stipulation may be executed in counterparts, by facsimile and/or by
8 electronic mail, each of which shall constitute an original, but all of which together shall
9 constitute one and the same Stipulation between the parties.
10

11 WHEREFORE, the parties pray this Honorable Court for an Order approving this
12 Stipulation and dismissing Navient Corporation as a Defendant in this adversary proceeding.
13

14
15 By: 

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