

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF KENTUCKY
OWENSBORO DIVISION**

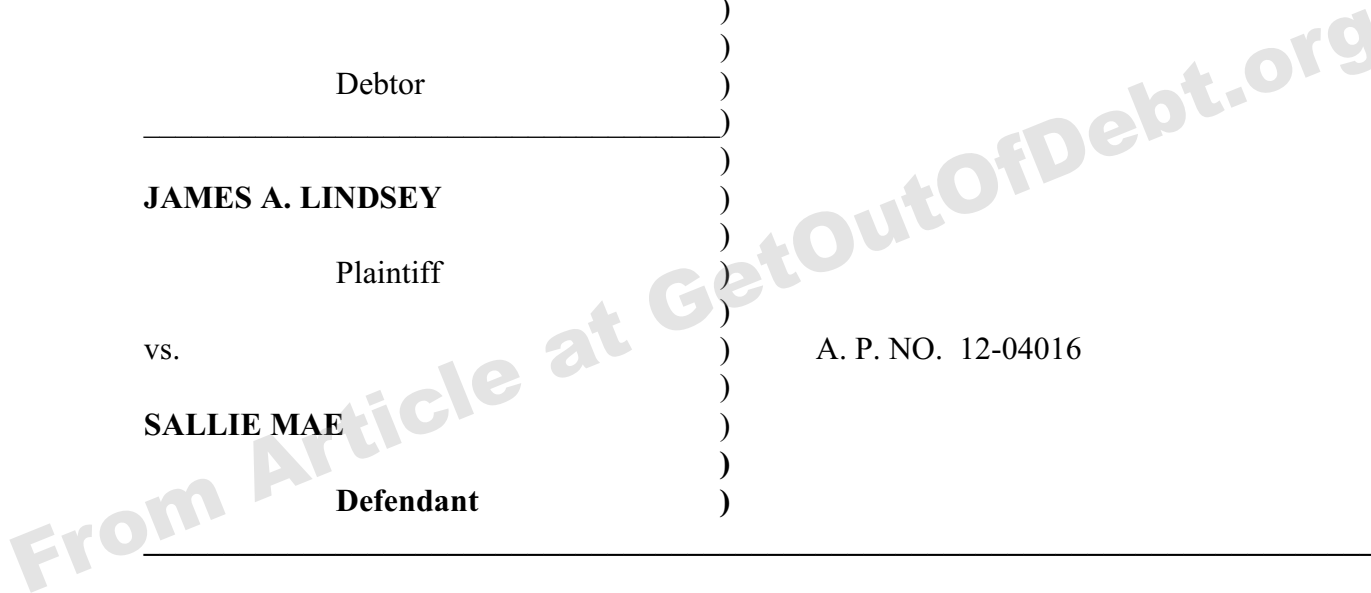
IN RE:)	
)	CASE NO. 12-40462
JAMES A. LINDSEY)	
)	
)	
Debtor)	
_____)	
JAMES A. LINDSEY)	
)	
Plaintiff)	
)	
vs.)	A. P. NO. 12-04016
)	
SALLIE MAE)	
)	
Defendant)	

MOTION AND CERTIFICATE FOR DEFAULT JUDGMENT

Now comes the Plaintiff, James A. Lindsey, by counsel, and moves this Court for default judgment against the Defendant, Sallie Mae the collection agency, Pioneer Credit Recovery, Inc..

In support whereof Plaintiff represents to the Court that Defendant, Sallie Mae, and Pioneer Credit Recovery have been properly served with notice of this suit in accordance with FRCP Rule 4 and BR 7004 and, further, that at least 30 days have passed since issuance of the summons (to-wit, May 10, 2012) and that said Defendant has failed to plead or otherwise defend and that Plaintiff is entitled to judgment by default pursuant to BR 7055 and 11 U.S.C. Sec. 506.

WHEREFORE, Plaintiff requests an order determining that the debt owed to the Defendant is not an educational loan excepted from discharge under 11 USC §523(a)(8) or such



portion of it as the Court determines is an educational loan not otherwise subject to discharge that the Court find that repayment of the loan imposes an undue hardship on the Debtor and is dischargeable and for any and all other relief to which Plaintiff may appear entitled.

This 20th day of June, 2012.

/s/ Steven D Wilson
Steven D. Wilson
WILKEY & WILSON, P.S.C.
111 West Second Street
Owensboro KY 42303
(270) 685-6000

Certificate of Service

I hereby certify the foregoing has been filed electronically with the U S Bankruptcy Court this 20th day of June, 2012, and a copy furnished electronically or by U S Mail to:

Hon. William Lawrence
200 South Seventh St., Suite 310
Louisville KY422

Sallie Mae
P O Box 9500
Wilkes-Barre PA 18773-9500

Pioneer Credit Recovery, Inc.
P O Box 99
Arcade NY 14009

/s/ Steven D Wilson
Steven D. Wilson