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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

In re:

CHRISTIANA SULLIVAN,  
  
Debtor.

Bankr. No. 12-44784

CHRISTIANA SULLIVAN,  
  
Plaintiff,

Adv. Proc. No. 12-04403-PBS

v.

UNITED STATES DOING BUSINESS AS U.S.  
DEPARTMENT OF EDUCATION, et al.,  
  
Defendants.

**STIPULATED JUDGMENT**

COME NOW Plaintiff in this adversarial proceeding, Christiana Sullivan ("Plaintiff"), and the Defendant Department of Education ("DOE"), by and through their undersigned counsel of record, and hereby stipulate and agree:

1. Plaintiff's claims against DOE are hereby dismissed, with prejudice, and without costs or attorney's fees to Plaintiff or the DOE;

STIPULATED JUDGMENT - 1  
(A12-04403-PBS)

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WA 98101-1271  
(206) 553-7970

1           2.     Plaintiff will pay \$27,000 of her student loan obligations pursuant to the  
2           following payment plan:

3           a.     Following the approval of this Stipulated Judgment by the Bankruptcy Court  
4           and the dismissal of this adversarial proceeding against DOE, DOE will  
5           provide a copy of this Stipulated Judgment to Plaintiff's loan processor with  
6           instruction to adjust Plaintiff's monthly payment to \$75/month;

7           b.     Plaintiff shall make a payment of \$75/month to the loan processor every  
8           month beginning July 1, 2013, until the \$27,000 has been paid to DOE.

9           3.     The remainder of Plaintiff's current student loan obligations to DOE will be  
10          discharged upon completion of the stipulated payments in Paragraph 2 above.

11          4.     No interest shall accrue on the outstanding \$27,000 in student loan obligations.

12          5.     Nothing herein shall prevent Plaintiff from making monthly payments in an  
13          amount greater than the amounts specified in Paragraph 2. If Plaintiff makes  
14          payments to DOE totaling \$27,000 prior to the end of the payment plan,  
15          Plaintiff's monthly payment obligations set forth in paragraph 2 shall cease.

16          6.     If Plaintiff defaults under the terms of this Stipulated Judgment and is delinquent  
17          in payment of her loans for more than 180 days, the remaining balance, including  
18          interest, at the time of default, plus collection activity fees, will be immediately  
19          due and owing to DOE, which may proceed with any collection procedures  
20          permissible by law. However, if Plaintiff notifies DOE within 30 days of the date  
21          a payment was due of the circumstances that have rendered Plaintiff unable to  
22          make the monthly payment, DOE will work in good faith with Plaintiff to agree  
23          upon the terms of a forbearance suspending or reducing the monthly payments for  
24          25          26          27          28

1 a certain period of time. If Plaintiff and DOE agree upon the terms of a  
2 forbearance, DOE will not proceed with any collection procedures during the  
3 agreed upon forbearance period.

4 7. Before declaring Plaintiff in default pursuant to Paragraph 6, DOE shall first  
5 provide Plaintiff notice of such default in writing and shall afford Plaintiff 30  
6 days from the date of mailing to cure the default. Notice of default shall be  
7 mailed to Ms. Magus at the address provided below.

8 8. Nothing herein shall prevent Plaintiff from submitting an application for a Total  
9 and Permanent Disability discharge to DOE should Plaintiff believe she has  
10 become qualified for such a discharge.

11 9. This Stipulated Judgment shall be binding on any successors of DOE or any  
12 assignees of the student loan obligations.

13 10. Payments made pursuant to this Stipulated Judgment shall include Plaintiff's  
14 Social Security Number, shall be made payable to the U.S. Department of  
15 Education in the manner instructed by the loan processor.

16 11. Any notice under this Stipulated Judgment shall be mailed to:

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19  
20 Christiana Sullivan  
21 4614 113<sup>th</sup> Street SW, Apt 1  
22 Lakewood, WA 98499

23 Richard D. Granvold  
24 Law Offices of Richard D. Granvold, P.S.  
25 31620 23<sup>rd</sup> Avenue South, Suite 205  
26 Federal Way, WA 98003

27 U.S. Department of Education  
28 Processing Group, Room 8600  
50 Beale Street  
San Francisco, California 94105

1 12. This Stipulated Judgment may be signed in counterparts (including, without  
2 limitation, by PDF or facsimile) each of which will be deemed an original and all  
3 of which will be taken together and deemed one instrument.

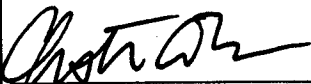
4 13. This Stipulated Judgment is subject to the approval of the Bankruptcy Court. In  
5 the event that the Bankruptcy Court declines to approve this Stipulated Judgment,  
6 it shall be null and void, with no force or effect.

7 14. Plaintiff and DOE understand and agree that this Stipulated Judgment contains the  
8 entire agreement between them, and that any statements, representations,  
9 promises, agreements, or negotiations, oral or otherwise, between the parties or  
10 their counsel that are not included herein shall be of no force or effect.

11 15. Plaintiff hereby agrees to accept the terms set forth in this Stipulated Judgment in  
12 full settlement and satisfaction of any and all claims, demands, rights, and causes  
13 of action of whatsoever kind and nature, arising from the same subject matter that  
14 gave rise to the above-captioned action, including any future claim or lawsuit of  
15 any kind or type whatsoever, whether known or unknown, and whether for  
16 compensatory or exemplary damages.  
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21 Respectfully submitted this 11th day of April, 2013.

22 JENNY A. DURKAN  
23 United States Attorney

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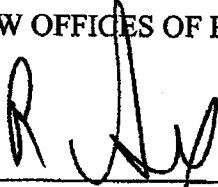
25 Christina Dimock, WSBA #40159  
26 Assistant United States Attorney  
27 United States Attorney's Office  
28 700 Stewart Street, Suite 5220  
Seattle, Washington 98101

STIPULATED JUDGMENT - 4  
(A12-04403-PBS)

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1 Phone: (206) 553-7970  
E-mail: christina.dimock@usdoj.gov  
2 Attorney for the Department of Education

3  
4 LAW OFFICES OF RICHARD D. GRANVOLD, P.S.

5   
6

7 Richard D. Granvold  
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8 Federal Way, WA 98003  
Phone: (253) 945-6062  
9 Email: rgranvold@msn.com  
10 Attorney for Plaintiff

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STIPULATED JUDGMENT - 5  
(A12-04403-PBS)

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