

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In re:

[DEBTOR(s)],

Debtor(s).

Case No. [xx-xxxxx]

Chapter [x]

[DEBTOR(s)],

Plaintiff,

v.

Adversary Number: [xx-xxxxx]

UNITED STATES DEPARTMENT
OF EDUCATION,

Defendant.

**JOINT MOTION TO STAY ADVERSARY PROCEEDING AS TO
THE UNITED STATES DEPARTMENT OF EDUCATION**

Defendant the United States of America, acting through the United States Department of Education and the undersigned U.S. Attorney and Assistant U.S. Attorney (“Education”), and _____ (“Plaintiff”) hereby move for a stay of the above-captioned adversary proceeding as to Education for ____ days, up to and including _____, 2026. In support, the parties state as follows:

1. On _____, Plaintiff filed a Complaint to Determine Dischargeability of Student Loans [ECF No. 1] (“Complaint”) seeking to discharge certain educational loans.

2. The parties seek to stay the adversary proceeding as to Education through and including _____, 2026, in order to pursue settlement discussions. This is the first request for a stay in this adversary proceeding.

3. The parties believe a stay is appropriate in this case to permit them adequate time to pursue settlement discussions through the attestation process. A stay in this case promotes judicial economy and resources as the parties work toward a possible resolution of this case. Lastly, the parties do not seek a stay for any improper purpose and do not believe the stay will be detrimental or prejudicial to either party.

WHEREFORE, the parties respectfully request that the Court enter an order granting this motion, staying this adversary proceeding as to Education through and including _____, 2026, and granting any additional relief the Court deems appropriate.

Dated: [date]

UNITED STATES ATTORNEY

Signature
[United States Attorney's Office
address, phone, email]

*Counsel for U.S. Department of
Education*

Signature
[Firm name, address, phone, email]

Counsel for Debtor