

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re: HILAL K. HOMAIDAN, f/k/a Helal K. Homaidan, Debtor.	Chapter 7 Case No. 08-48275 (ESS)
In re: REEHAM YOUSSEF aka Reeham Navarro Youssef aka Reeham N. Youssef, Debtor.	Chapter 7 Case No. 13-46495 (ESS)
HILAL K. HOMAIDAN on behalf of himself and all others similarly situated Plaintiff, v. SALLIE MAE, INC, NAVIENT SOLUTIONS, LLC, NAVIENT CREDIT FINANCE CORPORATION Defendants.	Adv. Pro. No. 17-1085

NOTICE OF COMPLIANCE

On September 6, 2022, Navient ceased collection activities on 7,368 Tuition Answer loans. The Tuition Answer loans subject to this collection cease meet two criteria: (1) at least one borrower on each loan obtained a discharge in bankruptcy on or after January 1, 2005 (as reported in PACER records), and (2) the amount disbursed on each loan exceeded cost-of-attendance

figures reported to IPEDS. The collection activities that Navient has ceased include the transmittal of monthly statements as well as any outgoing written or oral communications requesting payment.

Navient has taken these steps in an effort to comply with the Temporary Restraining Order, Dkt. No. 343, entered on July 11, 2022. Navient does not concede that any of the loans covered by the collection cease described above were in fact discharged or dischargeable in bankruptcy. Nor does Navient concede that the cost-of-attendance figures reported to IPEDS and utilized by Navient as a criteria for its compliance with the TRO represent the actual cost-of-attendance for any applicable borrower. Navient likewise does not concede that all of the activities it has ceased constitute acts of collection. Navient submits this Notice of Compliance subject to all of the arguments it has previously made in opposition to the entry of the Temporary Restraining Order and subject to all of Navient's appellate rights.

Respectfully submitted,

/s/ Shawn R. Fox

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CERTIFICATE OF SERVICE

I certify that on the 8th day of September, 2022, I filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Shawn R. Fox

Shawn R. Fox