

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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<i>In re</i>	:	Chapter 11
	:	Case No. 08-12229 (MFW)
WASHINGTON MUTUAL, INC., <i>et al.</i> , ¹	:	
	:	Jointly Administered
Debtors.	:	Re: Dockets No. 974 & 1017
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**CERTIFICATION OF COUNSEL SEEKING ENTRY OF
ORDER APPROVING STIPULATION BETWEEN THE DEBTORS,
WASHINGTON MUTUAL, INC. AND WMI INVESTMENT CORP., AND
JPMORGAN CHASE BANK, N.A. TO EXTEND TIME FOR FILING OF REPLY
TO OBJECTION TO DEBTORS' MOTION FOR AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004.1
DIRECTING THE EXAMINATION OF JPMORGAN CHASE BANK, N.A.**

I, Neil R. Lapinski, proposed Delaware special litigation and conflict counsel to Washington Mutual, Inc. and WMI Investment Corp. (collectively, the "Debtors"), hereby certify the following:

1. On May 1, 2009, the Debtors filed a Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. ("JPMC")(Docket No. 974).

2. On May 13, 2009, JPMC filed an Objection and Response to Debtors' Motions for (A) an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. (Docket No. 974); and (B) an Order Pursuant to 11 U.S.C. § 105(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the

¹ The Debtors in these chapter 11 cases (the "Chapter 11 Cases") and the last four digits of each Debtor's federal tax identification numbers are: (i) Washington Mutual, Inc. (3725) and (ii) WMI Investment Corp. (5395).



Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. (Docket No. 10) (the "Objection")(Docket No. 1017).

3. Pursuant to Local Bankruptcy Rule 9006-1(d), the Debtors' reply is due by 4:00 p.m. on May 15, 2009.

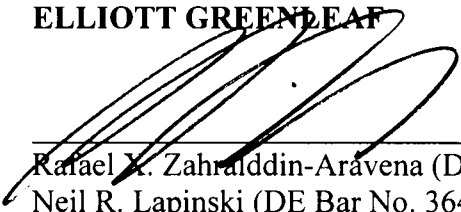
4. On May 15, 2009, the Debtors and JPMC entered into that certain Stipulation Between the Debtors, Washington Mutual, Inc. and WMI Investment Corp., and JPMorgan Chase Bank, N.A. to Extend Time for Filing of Reply to Objection to Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. (the "Stipulation") attached hereto as Exhibit A.

5. Pursuant to the Stipulation and consistent with Fed. R. Civ. Proc. 6(b), the Debtors and JPMC have agreed that good cause exists to enlarge and extend the time in which the Debtors must reply to the Objection until May 18, 2009 at 8:00 a.m.

6. The Debtors request that the Court enter the Proposed Order, attached hereto as Exhibit B, approving the Stipulation at its earliest convenience. Counsel is available at the request of the Court.

Dated: May 15, 2009
Wilmington, Delaware

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*Proposed Special Litigation and Conflicts Co-Counsel to
Washington Mutual, Inc. and WMI Investment Corp*

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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<i>In re</i>	:	Chapter 11
	:	Case No. 08-12229 (MFW)
WASHINGTON MUTUAL, INC., <i>et al.</i> , ¹	:	
	:	Jointly Administered
Debtors.	:	Re: Dockets No. 974 & 1017
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**STIPULATION BETWEEN THE DEBTORS, WASHINGTON MUTUAL,
INC. AND WMI INVESTMENT CORP., AND JPMORGAN CHASE
BANK, N.A. TO EXTEND TIME FOR FILING OF REPLY TO
OBJECTION TO DEBTORS' MOTION FOR AN ORDER PURSUANT
TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004.1
DIRECTING THE EXAMINATION OF JPMORGAN CHASE BANK, N.A.**

WHEREAS Washington Mutual, Inc. ("WMI") and WMI Investments Corporation ("WMI Investments," and with WMI, "Debtors") filed a Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. ("JPMC")(Docket No. 974) on May 1, 2009; and

WHEREAS JPMC filed an Objection and Response to Debtors' Motions for (A) an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. (Docket No. 974); and (B) an Order Pursuant to 11 U.S.C. § 105(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. (Docket No. 10) on May 13, 2009 (the "Objection")(Docket No. 1017); and

WHEREAS the Debtors' reply is due by 4:00 p.m. on May 15, 2009 pursuant to Local Bankruptcy Rule 9006-1(d);

¹ The Debtors in these chapter 11 cases (the "Chapter 11 Cases") and the last four digits of each Debtor's federal tax identification numbers are: (i) Washington Mutual, Inc. (3725) and (ii) WMI Investment Corp. (5395).

IT IS THEREFORE STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

Washington Mutual, Inc. and WMI Investment Corp. shall each have until 8:00 a.m. on May 18, 2009 to file a reply to the Objection.

Dated: May 15, 2009
Wilmington, Delaware

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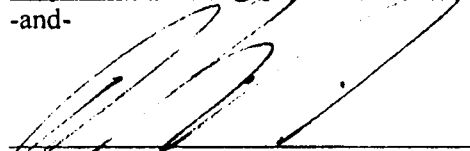
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*Proposed Co-Counsel for Washington Mutual,
Inc. and WMI Investment Corp.*

Exhibit B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	x	
	:	Chapter 11
<i>In re</i>	:	
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WASHINGTON MUTUAL, INC., <i>et al.</i> , ¹	:	
	:	Jointly Administered
Debtors.	:	
	:	Docket No. _____
	x	

**ORDER APPROVING STIPULATION BETWEEN THE DEBTORS,
WASHINGTON MUTUAL, INC. AND WMI INVESTMENT CORP.,
AND JPMORGAN CHASE BANK, N.A. TO EXTEND TIME FOR FILING
OF REPLY TO OBJECTION TO DEBTORS' MOTION FOR AN ORDER PURSUANT
TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004.1
DIRECTING THE EXAMINATION OF JPMORGAN CHASE BANK, N.A.**

Upon consideration of the *Stipulation Between the Debtors, Washington Mutual, Inc. and WMI Investment Corp., and JPMorgan Chase Bank, N.A. to Extend Time for Filing of Reply to Objection to Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A.* (the "Stipulation"); and after due deliberation; and it appearing that sufficient cause exists for granting the relief requested by the parties; it is hereby

ORDERED that the Stipulation, attached hereto as Exhibit A, is approved; and it is further

ORDERED that this Court shall retain jurisdiction to settle any disputes concerning the Stipulation and to interpret and enforce the provisions of the Stipulation and this Order.

Dated: _____, 2009
Wilmington, Delaware

Honorable Mary F. Walrath
United States Bankruptcy Judge

¹ The Debtors in these chapter 11 cases (the "Chapter 11 Cases") and the last four digits of each Debtor's federal tax identification numbers are: (i) Washington Mutual, Inc. (3725) and (ii) WMI Investment Corp. (5395).

**IN THE UNITED STATES BANKRUPTCY COURT
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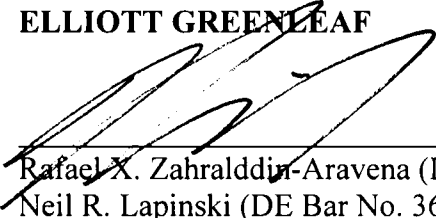
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	: Jointly Administered
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**CERTIFICATE OF SERVICE REGARDING CERTIFICATION OF
COUNSEL SEEKING ENTRY OF ORDER APPROVING STIPULATION
BETWEEN THE DEBTORS, WASHINGTON MUTUAL, INC. AND WMI
INVESTMENT CORP., AND JPMORGAN CHASE BANK, N.A. TO EXTEND
TIME FOR FILING OF REPLY TO OBJECTION TO DEBTORS' MOTION FOR
AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY
RULE 2004.1 DIRECTING THE EXAMINATION OF JPMORGAN CHASE BANK, N.A.**

I, Neil R. Lapinski, Esquire, Delaware counsel to Washington Mutual, Inc., hereby certify that I caused a copy of the Stipulation Between the Debtors, Washington Mutual, Inc. and WMI Investment Corp., and JPMorgan Chase Bank, N.A. to Extend Time for Filing of Reply to Objection to Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A., to be served on all Notice Parties via hand delivery on all local parties listed on the attached service list.

Dated: May 15, 2009
Wilmington, Delaware

ELLIOTT GREENLEAF



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