

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

In re:)	Case No. 08-12229 (MFW)
)	
WASHINGTON MUTUAL, INC., <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
)	
)	Hearing Date: January 28, 2010 at 4:00 p.m.
)	Objection Deadline: January 15, 2010 at 4:00 p.m.
)	(by agreement)

**RESERVATION OF RIGHTS OF STANDARD & POOR'S CORPORATION
TO DEBTORS' MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY
RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 DIRECTING THE
EXAMINATION OF WITNESSES AND PRODUCTION OF DOCUMENTS
FROM KNOWLEDGEABLE PARTIES [RE: D.I. 1997]**

Standard & Poor's Corporation ("S&P"), by its counsel, Morrison & Foerster LLP and Morris, Nichols, Arsht & Tunnell LLP, submits this Reservation of Rights (the "Reservation of Rights") regarding the Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Examination of Witnesses and Production of Documents from Knowledgeable Parties (the "Motion"). In support thereof, S&P respectfully represents as follows:

RESERVATION OF RIGHTS

1. Before the Debtors filed the Motion, counsel for S&P and counsel for the Debtors were in constructive discussions in an effort to narrow the scope of the Debtors' discovery request and cooperatively resolve any discovery issues. S&P expects that the parties will continue to cooperate with respect to discovery issues as these cases progress.

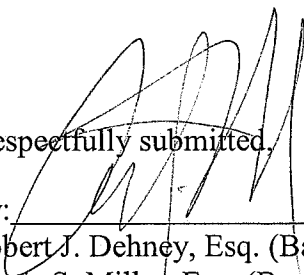
2. In the Motion, the Debtors are seeking authority to direct the production of documents by S&P. S&P does not oppose the Debtors' request, but hereby reserves all rights



with respect to any and all discovery matters, including without limitation the assertion of any applicable privileges, objections to any requests on any basis, and all other rights respecting the discovery being sought by the Debtors.

Dated: January 15, 2010
Wilmington, Delaware

Respectfully submitted,

By: 
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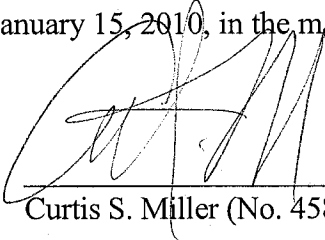
Counsel to Standard & Poor's Corporation

3339536

CERTIFICATE OF SERVICE

I, Curtis S. Miller, Esquire, certify that I am not less than 18 years of age, and that service of the foregoing **Reservation Of Rights Of Standard & Poor's Corporation To Debtors' Motion For An Order Pursuant To Bankruptcy Rule 2004 And Local Bankruptcy Rule 2004-1 Directing The Examination Of Witnesses And Production Of Documents From Knowledgeable Parties** was caused to be made on January 15, 2010, in the manner indicated upon the entities identified on the attached service list.

Date: January 15, 2010



Curtis S. Miller (No. 4583)

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