

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

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In re:	:	Chapter 11
WASHINGTON MUTUAL, INC., <u>et al.</u> ,	:	Case Nos. 08-12229 (MFW)
Debtors.	:	Jointly Administered
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WILLINGHAM <u>et al.</u> ,	:	Adv. Proc. No. 10-51297 (MFW)
Plaintiff,	:	
v.	:	<b>Proposed Objection Deadline: October 20, 2010 at 12:00 p.m.</b>
WASHINGTON MUTUAL, INC. <u>et al.</u> ,	:	
Defendant.	:	<b>Proposed Hearing Date: October 22 2010 at 10:00 a.m.</b>
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	X	

**MOTION FOR INTERVENTION OF THE  
WASHINGTON MUTUAL, INC. NOTEHOLDERS GROUP**

For the reasons set forth in the *Memorandum of Law in Support of the Motion for Intervention of the Washington Mutual, Inc. Noteholders Group* filed contemporaneously herewith, the Washington Mutual, Inc. Noteholders Group (the “WMI Noteholders”) by and through its undersigned counsel, hereby moves to intervene in the above-captioned adversary proceeding (the “Adversary Proceeding”) as a party in interest, pursuant to 11 U.S.C. § 1109(b) and Rule 24(a) of the Federal Rules of Civil Procedure, made applicable to this Adversary Proceeding pursuant to Rule 7024 of the Federal Rules of Bankruptcy Procedure.

WHEREFORE, the WMI Noteholders respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A, (i) granting the Motion and (ii) granting such other and further relief as the Court deems just and proper.



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Dated: October 12, 2010  
Wilmington, Delaware

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Attorneys for the Washington Mutual, Inc. Noteholders  
Group

**Exhibit A**

**Proposed Order**

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

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In re:	:	Chapter 11
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WILLINGHAM <u>et al.</u> ,	:	
Plaintiff,	:	
v.	:	Adv. Proc. No. 10-51297 (MFW)
WASHINGTON MUTUAL, INC. <u>et al.</u> ,	:	
Defendant.	:	<b>Re: Docket No: ____</b>
-----	:	
	X	

**ORDER GRANTING THE MOTION FOR INTERVENTION OF  
THE WASHINGTON MUTUAL, INC. NOTEHOLDERS GROUP**

Upon consideration of the *Motion for Intervention of the Washington Mutual, Inc. Noteholders Group* filed by the Washington Mutual, Inc. Noteholders Group (the “WMI Noteholders”), the Court finds that it has jurisdiction over this matter pursuant to 28 U.S.C. § 157 and 1334; this is a core proceeding pursuant to 28 U.S.C. § 157(b); venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; proper and adequate notice has been given and no other or further notice is necessary; and after due deliberation and sufficient cause appearing therefore, it is hereby:

ORDERED, ADJUDGED, AND DECREED THAT the Motion is hereby GRANTED;  
and it is further

ORDERED that the Washington Mutual, Inc. Noteholders Group is hereby permitted to intervene in Adversary Proceeding No. 10-51297 (MFW).

Dated: Wilmington, Delaware  
October \_\_, 2010

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THE HONORABLE MARY F. WALRATH  
UNITED STATES BANKRUPTCY JUDGE

**CERTIFICATE OF SERVICE**

I, John H. Strock, hereby certify that on the 12th day of October, 2010, I caused a copy of the **Motion for Intervention of the Washington Mutual, Inc. Noteholders Group** to be served upon the parties listed below *via* the manner indicated.

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