

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

In re:

WASHINGTON MUTUAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 08-12229 (MFW)

Jointly Administered

**AURELIUS CAPITAL MANAGEMENT, LP'S PRE-HEARING SUBMISSIONS
IN CONNECTION WITH CONFIRMATION**

In accordance with the Court's June 30, 2011 order [D.I. 8053], Aurelius Capital Management, LP ("Aurelius") respectfully submits the following pre-hearing submissions in support of its objection to confirmation of the Debtors' Modified Sixth Amended Plan ("Confirmation").

I. Aurelius's Witnesses

Aurelius does not intend to present witnesses in support of its Confirmation objection. Aurelius reserves the right to identify rebuttal witnesses in response to any other Confirmation submissions.

II. Aurelius's Proposed Exhibit List

Aurelius's Proposed Confirmation Exhibit List with respect to its objection to Confirmation is attached as Exhibit A to this submission. Aurelius reserves the right to file a supplemental Exhibit List to identify additional exhibits in response to other Confirmation submissions.

¹ The Debtors are (i) Washington Mutual, Inc. and (ii) Washington Mutual Investment Corp.



III. Aurelius's Designations in Connection with Confirmation

Aurelius reserves the right to designate testimony in response to other Confirmation submissions.

Dated: Wilmington, Delaware
July 8, 2011

BLANK ROME LLP

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EXHIBIT A

1001777.2

131127.01603/40195982v.1

Aurelius Capital Management LP's Proposed Exhibit List¹

				Objection	Admitted
AU1	JPMC Form 10-K	2008	N/A		
AU2	JPMC Form 10-K	2009	N/A		
AU3	JPMC Form 10-K	2010	N/A		
AU4	JPMC Form 10-Q	5/6/2011	N/A		
AU5	Account Security Agreement	5/31/2002	N/A		
AU6	Collateral Account Pledge and Security Agreement	3/1/2006	N/A		
AU7	All of the Debtors' Monthly Operating Reports	2008-2011	D.I. Nos. 198, 369, 539, 639, 741, 831, 970, 1083, 1229, 1387, 1542, 1672, 1790, 1945, 2077, 2280, 2425, 2737, 3606, 4428, 4830, 5163, 5372, 5519, 5717, 6153, 6392, 6628, 6789, 7082, 7216, 7832, and 8080.		

¹ Aurelius reserves the right to amend this exhibit list.

CERTIFICATE OF SERVICE

I, Victoria Guilfoyle, hereby certify that on July 8, 2011, I caused a copy of the following document to be served upon the parties listed on the attached service list in the manner indicated.

**AURELIUS CAPITAL MANAGEMENT, LP'S PRE-HEARING
SUBMISSIONS IN CONNECTION WITH CONFIRMATION**

Dated: July 8, 2011

/s/ Victoria Guilfoyle
Victoria Guilfoyle (DE No. 5183)

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