

Bankruptcy Court for the District of Delaware, dated June 30, 2011 (the “General Chambers Procedures”), authorizing the MBS Plaintiffs to exceed the forty (40) page limit for their *Motion to Temporarily Claim for Voting Purposes* (the “3018 Motion”), being filed contemporaneously herewith and respectfully state the following in support of this Motion:

RELIEF REQUESTED AND THE BASIS FOR SAME

1. The MBS Plaintiffs respectfully request that the Court enter an order authorizing the MBS Plaintiffs to file their 3018 Motion in excess of the forty (40) page limit (excluding any exhibits thereto).

2. Local Rule 7007-2(a)(iv) provides that no opening or opposing brief shall exceed forty (40) pages in length without leave of Court. Del. Bankr. L.R. 7007-2(a)(iv). General Chambers Procedures provides that “[a]ll briefs and memoranda (in main bankruptcy cases and in adversary proceedings) must comply with Del. Bankr. LR 7007-2.” General Chambers Pro., ¶ 2(a)(vi).

3. The MBS Plaintiffs respectfully submit that leave to file the 3018 Motion (fifty (50) pages excluding exhibits) in excess of forty (40) pages is reasonable, appropriate and warranted under the circumstances. The 3018 Motion seeks to temporarily allow the Class Proof of Claim in the amount of \$273 million dollars for purposes of voting on the Debtors’ Seventh Amended Plan (or as may be further amended). The Class Proof of Claim involves the application of complex federal securities laws which require the assertion of detailed facts, as opposed to general conclusory allegations in support of a claim. In order to provide the Court and the parties with specific details concerning the evidentiary basis for their claim against the Debtors, the MBS Plaintiffs have referred to numerous documents and statements concerning the Debtors and their principals within the text of the 3018 Motion. The MBS Plaintiffs have made every effort to comply with the Local Rules and the General Chambers Procedures to make the 3018 Motion as concise as possible. However, the MBS Plaintiffs are unable to provide the Court with the facts and law substantiating the Proof of Claim sufficient for a full understanding

of the same and a fair adjudication thereof without exceeding the forty (40) page limit. Accordingly, given these circumstances, the MBS plaintiffs respectfully submit that ample justification exists for the relief requested herein to permit the MBS Plaintiffs to file a fifty (50) page (excluding exhibits) 3018 Motion.

NO PRIOR REQUEST


4. No previous motion for the relief requested herein has been made to this or any other Court.

CONCLUSION

For the reasons stated above, the MBS Plaintiffs respectfully request that the Court enter an Order, substantially in the form attached hereto as Exhibit A, (i) granting the MBS Plaintiffs leave to file the Motion up to fifty (50) pages in length, and (ii) granting such other and further relief as the Court deems just and proper.

Dated: January 18, 2012

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---|---|-------------------------|
| In re: | : | Chapter 11 |
| | : | |
| WASHINGTON MUTUAL, INC., <i>et al.</i> , ¹ | : | Case No. 08-12229-(MFW) |
| | : | |
| Debtors. | : | (Jointly Administered) |
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ORDER GRANTING MBS PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT REQUIREMENT FOR DEBTORS' MOTION TO TEMPORARILY ALLOW CLAIM FOR VOTING PURPOSES

Upon the consideration of the motion dated January 18, 2012 (the "Motion"), for leave to exceed the page limit in connection with the MBS Plaintiffs' Motion the entry of an order temporarily allowing MBS Plaintiffs' Class Proof of Claim for voting purposes (the "3018 Motion"); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and no other or further notice being required; and upon consideration of (i) the Motion, and (ii) any objections or responses thereto; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ The Debtors in these 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).

2. The MBS Plaintiffs are authorized to file the 3018 Motion up to fifty (50) pages in length (excluding exhibits thereto).

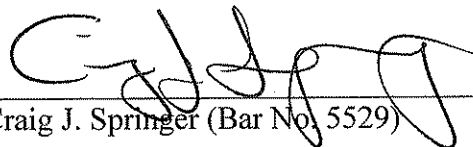
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to implementation, interpretation or enforcement of this Order.

Dated: _____, 2012

HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

CERTIFICATE OF SERVICE

I, Craig J. Springer, hereby certify that on this 18th day of January, 2012, I caused copies of the *MBS Plaintiffs' Motion for Leave to Exceed the Page Limit Requirement for Motion to Temporarily Allow Claim for Voting Purposes* to be served on the attached service list in the manner indicated.



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