IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

Chapter 11

Case No. 08-12229 (MFW)

(Jointly Administered)

Debtors.

Re: Docket No. 9803

CERTIFICATION OF NO OBJECTION REGARDING DEBTORS' SEVENTY-FIRST OMNIBUS (SUBSTANTIVE) <u>OBJECTION TO LATE-FILED CLAIMS</u>

The undersigned hereby certifies that, as of the date hereof, the above-captioned debtors and debtors in possession (collectively, the "Debtors") have received no answer, objection or any other responsive pleading to the Debtors' Seventy-First Omnibus (Substantive) Objection to Late-Filed Claims [Docket No. 9803] (the "Claims Objection"), filed by the Debtors with the United States Bankruptcy Court for the District of Delaware (the "Court") on March 2, 2012.

The undersigned further certifies that he has reviewed the Court's docket in the above-captioned cases and that no answer, objection or other responsive pleading to the Claims Objection appears thereon. Responses to the Claims Objection, if any, were to be filed and served no later than March 19, 2012 at 4:00 p.m. (EDT).

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are: (i) Washington Mutual, Inc. (3725); and (ii) WMI Investment Corp. (5395). The Debtors' principal offices are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.



It is hereby respectfully requested that the proposed order attached to the Claims Objection, a copy of which is attached hereto as Exhibit A, be entered at the earliest convenience of the Court.

Dated: March 22, 2012 Wilmington, Delaware

Respectfully submitted,

Mark D. Collins (No.-2981)

Michael J. Merchant (No. 3854)

Travis A. McRoberts (No. 5274)

RICHARDS, LAYTON & FINGER, P.A.

One Rodney Square

920 North King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

-and-

Brian S. Rosen, Esq. WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for the Debtors and Debtors in Possession

EXHIBIT A

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

X			
	•		
In re	:	Chapter 11	
	:		
WASHINGTON MUTUAL, INC., et al., 1	:	Case No. 08-12229 (MFW)	
	•		
Debtors.	•	: (Jointly Administered)	
	•		
	Y	" Re: Docket No. 9803	

ORDER GRANTING DEBTORS' SEVENTY-FIRST OMNIBUS (SUBSTANTIVE) OBJECTION TO LATE-FILED CLAIMS

Upon the objection, dated March 3, 2012 (the "Seventy-First Omnibus Objection"), of Washington Mutual, Inc. ("WMI") and WMI Investment Corp. (collectively, the "Debtors"), as debtors and debtors in possession, for entry of an order disallowing in their entirety certain claims filed against these estates, all as more fully set forth in the Seventy-First Omnibus Objection; and upon the Declaration of John Maciel Pursuant to Local Rule 3007-1 in Support of the Debtors' Seventy-First Omnibus (Substantive) Objection to Late-Filed Claims, dated as of March 3, 2012; and the Court having jurisdiction to consider the Seventy-First Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Seventy-First Omnibus Objection and the relief requested therein 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 Seventy-First Omnibus Objection having been provided to those parties identified therein, and no other or

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are: (i) Washington Mutual, Inc. (3725); and (ii) WMI Investment Corp. (5395). The Debtors' principal offices are located at 1201 Third Avenue, Seattle, Washington 98101.

² Capitalized terms used, but otherwise not defined herein, shall have the meanings ascribed to them in the Seventy-First Omnibus Objection.

further notice being required; and each of the claims listed on the exhibits hereto having been previously objected to and disallowed on the basis that such claims had been filed after the Bar Date; and each of the claims listed on the exhibits hereto having been reinstated, in accordance with the January Opinion;³ and the Court having determined that the relief sought in the Seventy-First Omnibus Objection is in the best interest of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Seventy-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Seventy-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that each claim listed on $\underline{\text{Exhibit A}}$ hereto is hereby disallowed in its entirety; and it is further

ORDERED that Kurtzman Carson Consultants, LLC, the Debtors' courtappointed claims and noticing agent, is authorized and directed to delete the claims listed in Exhibit A in the official claims register in these chapter 11 cases from such official claims register; and it is further

ORDERED that nothing contained herein (a) shall be, or shall be deemed to be, a determination that JPMorgan Chase Bank, N.A. or any of its affiliates or subsidiaries ("JPMC"), Washington Mutual Bank ("WMB") or any of WMB's subsidiaries, or any other person is or is not liable or responsible in any way for any of the claims that are the subject of this Order or (b) shall prejudice (i) any of JPMC's rights or claims against the Debtors to the extent such rights or claims are (A) asserted in proofs of claim timely filed by JPMC against the Debtors, as such

³ Capitalized terms used, but not defined, herein shall have the meaning ascribed to them in the Seventy-First Omnibus Objection.

claims may be amended or modified pursuant to applicable bankruptcy law, or (B) provided for

or permitted to be asserted pursuant to an order of this Court entered, or to be entered, upon

notice and a hearing to the extent notice and a hearing is required, or (ii) the rights of the Debtors

or any other parties in interest to object thereto.; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to the implementation, interpretation, or enforcement of this

Order.

Dated: March ____, 2012

Wilmington, Delaware

THE HONORABLE MARY F. WALRATH UNITED STATES BANKRUPTCY JUDGE

3

Exhibit A

Claims to be Disallowed

Claimant	Claim Number	Filed Claim Amount	Debtor
Treasurer, State of New Jersey	3651	Unliquidated	WMI
Cypress Avenue JP/DL, LLC	3665	\$ 91,042.58	WMI
Broadridge Investor Communications Services	3727	\$ 11,301.69	WMI
Selig Plaza Midtown, LLC	3733	· · · \$ 206,942.30	WMI
City of Tucson	3734	\$ 191.80	WMI
Rosa Estrada	3825	\$ 151,455.26	WMI
Hasler Financial Services	3838	\$ 2,607.77	WMI