

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIMS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : Chapter 11
: :
WASHINGTON MUTUAL, INC., et al.,¹ : Case No. 08-12229 (MFW)
: :
Debtors. : (Jointly Administered)
: :
: : Hearing Date: October 30, 2012 at 11:30 a.m. (ET)
-----X : Response Deadline: October 8, 2012 at 4:00 p.m. (ET)

**WMI LIQUIDATING TRUST'S EIGHTY-SEVENTH
OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

WMI Liquidating Trust ("WMILT"), as successor in interest to Washington Mutual, Inc. ("WMI") and WMI Investment Corp., formerly debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), file this eighty-seventh omnibus non-substantive objection (the "Eighty-Seventh Omnibus Objection") to those claims listed on Exhibit A hereto, and in support of the Eighty-Seventh Omnibus Objection, respectfully represent as follows:

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 principal offices of WMILT, as defined herein, are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.



Jurisdiction

1. This Court has jurisdiction to consider 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 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

2. On September 26, 2008 (the "Commencement Date"), each of the Debtors commenced with this Court a voluntary case pursuant to chapter 11 of the Bankruptcy Code.

3. On December 12, 2011, the Debtors filed their *Seventh Amended Joint Plan of Affiliated Debtors Pursuant to Chapter 11 of the United States Bankruptcy Code* [D.I. 9178] (as modified, the "Plan"). By order [D.I. 9759] (the "Confirmation Order"), dated February 23, 2012, this Court confirmed the Plan and, upon satisfaction or waiver of the conditions described in the Plan, the transactions contemplated by the Plan were consummated on March 19, 2012.

WMI's Business

4. Prior to the Commencement Date, WMI operated as a savings and loan holding company that owned Washington Mutual Bank ("WMB") and, indirectly, such bank's subsidiaries, including Washington Mutual Bank fsb ("WMBfsb"). Like all savings and loan holding companies, WMI was subject to regulation by the Office of Thrift Supervision (the "OTS"). WMB and WMBfsb, in turn, like all depository institutions with federal thrift charters, were subject to regulation and examination by the OTS. In addition, WMI's banking and nonbanking subsidiaries were overseen by various federal and state authorities, including the Federal Deposit Insurance Corporation ("FDIC").

5. On September 25, 2008, the Director of the OTS, by order number 2008-36, appointed the FDIC as receiver for WMB (the "Bank Seizure") and advised that the receiver

was immediately taking possession of WMB (the “Receivership”). Immediately after its appointment as receiver, the FDIC purportedly sold substantially all the assets of WMB, including the stock of WMBfsb (the “JPMC Transaction”), to JPMorgan Chase Bank, National Association (“JPMC”) pursuant to that certain *Purchase and Assumption Agreement, Whole Bank*, dated as of September 25, 2008 (the “Purchase Agreement”).

The Bar Date and Schedules

6. On December 19, 2008, the Debtors filed with the Court their schedules of assets and liabilities and their statements of financial affairs. On January 27, 2009, and February 24, 2009, WMI filed with the Court its first and second, respectively, amended schedule of assets and liabilities and its first and second, respectively, amended statements of financial affairs. On January 14, 2010, WMI filed a further amendment to its statement of financial affairs (collectively, the “Schedules”).

7. By order, dated January 30, 2009 (the “Bar Date Order”), the Court established March 31, 2009 (the “Bar Date”) as the deadline for filing proofs of claim against the Debtors in these chapter 11 cases. Pursuant to the Bar Date Order, each creditor, subject to certain limited exceptions, was required to file a proof of claim on or before the Bar Date.

8. In accordance with the Bar Date Order, Kurtzman Carson Consultants, LLC (“KCC”), the Debtors’ court-appointed claims and noticing agent, mailed notices of the Bar Date and proof of claim forms to, among others, all of the Debtors’ creditors and other known holders of claims as of the Commencement Date. Notice of the Bar Date also was published once in *The New York Times (National Edition)*, *The Wall Street Journal*, *The Seattle Times*, and *The Seattle Post-Intelligencer*.

Proofs of Claim

9. Over 4,000 proofs of claim have been filed in these chapter 11 cases. WMILT is in the process of reviewing and reconciling the filed proofs of claim. To date, approximately 3,100 claims have been disallowed or withdrawn.

10. As part of its ongoing review, WMILT has reviewed each of the proofs of claim listed on Exhibit A hereto and has concluded that each such claim is appropriately objected to on the basis set forth below.

Objection to Claims

11. Local Rule 3007-1 allows a debtor to file an omnibus objection to proofs of claim on non-substantive grounds. Omnibus non-substantive objections must include sufficient detail as to why each claim should be disallowed and must be limited to no more than 150 claims. *See* Local Rule 3007-1(f)(i). The following omnibus objection complies with Local Rule 3007-1(f)(i) as well as the other requirements of Local Rule 3007.

12. Each of the claims listed on Exhibit A hereto arises from the holding of certain hybrid REIT trust preferred securities (the “Trust Preferred Securities”), which were automatically exchanged for preferred equity interests – specifically, Perpetual Non-Cumulative Fixed or Fixed-to-Floating Rate Preferred Stock in Series I, J, L, M and N, as applicable (collectively, the “REIT Series”). Because equity interests are not claims against the Debtors’ estates, WMILT requests that the Court disallow the claims listed on Exhibit A in their entirety.

13. Moreover, in the Bar Date Order, the Court specifically ordered that “any person or entity that holds an interest in any Debtor, which interest is based exclusively upon the ownership of common or preferred stock” is **not** required to file a proof of claim. (Bar Date Order, at pp.4-5). With respect to the REIT Series, all holders of such securities (including all of

the claimants listed on Exhibit A hereto) held such securities through brokers or nominees, and thus the Debtors, or WMILT, as the case may be, were and are able to effectuate distributions to holders of such securities, whether or not such holders filed claims with respect to such securities.

14. This Eighty-Seventh Omnibus Objection is being filed concurrently with WMILT's *Eighty-Sixth Omnibus Objection to Claims* (the "Eighty-Sixth Omnibus Objection"), wherein the Debtors have objected to similar claims on identical grounds. Any capitalized terms used but not defined herein shall have the meaning ascribed to them in the Eighty-Sixth Omnibus Objection. Because the Local Rules specify that omnibus claims objection should include no more than 150 claims, the Debtors have objected to 4 Preferred Funding Trust Claims and 140 Individual Trust Preferred Claims in the Eighty-Sixth Omnibus Objection and to 102 Individual Trust Preferred Claims listed on Exhibit A hereto (the "Individual Trust Preferred Claims").

15. In February 2006, WMB's REIT subsidiary, University Street, Inc., created a new subsidiary called Washington Mutual Preferred Funding LLC, a Delaware limited liability company, to facilitate capital-raising transactions through the issuance of the Trust Preferred Securities to investors. The Trust Preferred Securities, an aggregate liquidation preference of \$4 billion, were issued through a series of four issuer trusts established under Delaware law (the "Delaware Issuer Trusts") and one additional issuing entity established as a company under Cayman law to facilitate the sale of Trust Preferred Securities to non-U.S. investors (the "Cayman Issuer").²

² The Preferred Funding Trust Claims have been brought on behalf of the four Delaware Issuer Trusts with a purported liquidation preference of \$3.25 billion. No such claim has been brought on behalf of the Cayman Issuer which has a purported liquidation preference of \$750 million.

16. A key defining feature of the Trust Preferred Securities is the automatic exchange of the Trust Preferred Securities into WMI Preferred Shares at the direction of the OTS upon the occurrence of a defined “Exchange Event.” Pursuant to the Conditional Exchange, the Trust Preferred Securities were to be exchanged for depositary shares, each representing 1/1,000th of a share of one of the REIT Series, as applicable – none of which were outstanding prior to September 25, 2008. As the Court is well aware, the Conditional Exchange has been completed. Indeed, on January 7, 2011, the Court issued an opinion and entered an accompanying order holding, *inter alia*, that “the Conditional Exchange occurred on September 26, 2008” and that “the certificates held by the TPS holders are no longer TPS but are deemed to be Depositary Shares tied to WMI Preferred Shares.” Thus, the individual holders of the Trust Preferred Securities were deemed to own interests in WMI preferred equity.

17. The Bankruptcy Code defines an “equity security” as:

(A) share in a corporation, whether or not transferable or denominated “stock”, or similar security;

(B) interest of a limited partner in a limited partnership; or

(C) warrant or right, other than a right to convert, to purchase, sell, or subscribe to a share, security, or interest of a kind specified in subparagraph (A) or (B) of this paragraph.

11 U.S.C. § 101(16). Holders of equity securities, such as shares of preferred stock, do not have “claims” pursuant to section 101(5) of the Bankruptcy Code, but rather equity interests. *See In re Insilco Technologies, Inc.*, 480 F.3d 212, 218 (3rd Cir. 2007) (“[an equity] interest is not a claim at all”); *In re Hedged-Investments Associates*, 84 F.3d 1267, 1272 (10th Cir. 1996) (“Simply put, an equity interest is not a claim against the debtor.”). Because equity interests are not claims against the Debtors’ estates, WMILT requests that the Court disallow the Individual Trust Preferred Claims in their entirety.

18. Additionally, most of the Individual Trust Preferred Claims are duplicative of proofs of claim numbered 2181, 2182, 2183, and 2184 (the “Preferred Funding Trust Claims”), filed by the trustee for the holders of the Trust Preferred Securities, Wilmington Trust Company (“Wilmington”). Therein, Wilmington alleged that, pursuant to the terms of the Trust Agreements, it has “the power and authority to act on behalf of the Trust[s] and to enforce any of the Trust[s’] rights in respect of the [Trust Preferred Securities] for the benefit of the Holders of the [Trust Preferred Securities].”

19. WMILT has objected to the Preferred Funding Trust Claims on similar grounds in the Eighty-Sixth Omnibus Objection. In addition to the non-substantive arguments above against the Individual Trust Preferred Claims, WMILT also notes that, other than a small number of claims arising from holdings of Trust Preferred Securities from the Cayman Issuer (which are not covered by the Preferred Funding Trust Claims), the Individual Trust Preferred Claims are duplicates of the Preferred Funding Trust Claims. Pursuant to Section 4.07 of the Trust Agreements, Wilmington had the right, but not the obligation, to enforce the any of the rights of the Delaware Issuer Trusts for the benefit of the holders of the Trust Preferred Securities. As Wilmington has already asserted claims on account of holdings of the Trust Preferred Securities, the Court should also disallow in their entirety such Individual Trust Preferred Claims on the grounds that they are duplicative.

20. Additionally, it should be noted that the holders of REIT Series – including the claimants listed on Exhibit A, to the extent they held the REIT Series as of the voting record date of the Plan – were classified in Class 19 of the Plan and already received a distribution (and will receive future distributions to Class 19, should there be any), provided they granted releases with respect to the Plan. To avoid the possibility of multiple recoveries by the

same claimant, WMILT requests that the Court disallow in their entirety the Individual Trust Preferred Claims.

21. However, regardless of whether any Individual Trust Preferred Claim arises from a holding of Trust Preferred Securities from the Cayman Issuer, all Individual Trust Preferred Claims should be disallowed because they are equity interests and equity interests are not claims against Debtors' estates.

22. WMILT has identified the proofs of claim that contain the Individual Trust Preferred Claims listed on Exhibit A by reviewing the attached supporting documentation to those proofs of claim, which contain, *inter alia*, CUSIP numbers identifying them as Trust Preferred Securities.

Declaration

23. In support of the foregoing, WMILT relies on the *Declaration of John Maciel Pursuant to Local Rule 3007-1 in Support of the Eighty-Seventh Omnibus Objection*, dated as of the date hereof, attached hereto as Exhibit B.

Notice

24. Notice of this Eighty-Seventh Omnibus Objection has been provided to: (i) the U.S. Trustee, (ii) those parties entitled to receive notice in these chapter 11 cases pursuant to Bankruptcy Rule 2002, and (iii) each holder of a claim objected to herein. In light of the nature of the relief requested, WMILT submits that no other or further notice need be provided.

25. Pursuant to Bankruptcy Rule 3007, WMILT has provided all claimants affected by the Eighty-Seventh Omnibus Objection with at least thirty (30) days' notice of the hearing to consider the Eighty-Seventh Omnibus Objection.

Statement of Compliance with Local Rule 3007-1

26. The undersigned representative of Richards, Layton & Finger, P.A. (“RLF”) certifies that he has reviewed the requirements of Local Rule 3007-1 and that the Eighty-Seventh Omnibus Objection substantially complies with that Local Rule. To the extent that the Eighty-Seventh Omnibus Objection does not comply in all respects with the requirements of Local Rule 3007-1, RLF believes such deviations are not material and respectfully requests that any such requirement be waived.

WHEREFORE WMILT respectfully requests that the Court enter an order granting (i) the relief requested herein and (ii) such other and further relief as is just.

Dated: September 17, 2012
Wilmington, Delaware



Mark D. Collins (No. 2981)
Paul N. Heath (No. 3704)
Julie A. Finocchiaro (No. 5303)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, Delaware 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 to the WMI Liquidating Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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: **Chapter 11**
: **Case No. 08-12229 (MFW)**
: **(Jointly Administered)**
: **Hearing Date: October 30, 2012 at 11:30 a.m. (ET)**
: **Response Deadline: October 8, 2012 at 4:00 p.m. (ET)**
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In re
WASHINGTON MUTUAL, INC., et al.,¹
Debtors.

**NOTICE OF WMI LIQUIDATING TRUST'S EIGHTY-SEVENTH OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

PLEASE TAKE NOTICE that on September 17, 2012, WMI Liquidating Trust (“WMILT”), as successor in interest to Washington Mutual, Inc. (“WMI”) and WMI Investment Corp., formerly debtors and debtors in possession (collectively, the “Debtors”) filed the *WMI Liquidating Trust’s Eighty-Seventh Omnibus (Non-Substantive) Objection to Claims* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Objection must be filed in writing with the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel for the Debtors on or before **October 8, 2012 at 4:00 p.m. (ET)**.


PLEASE TAKE FURTHER NOTICE that, in the event that one or more responses to the Objection are timely filed, the Objection shall be considered at a hearing before

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 principal offices of WMI Liquidating Trust are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.

The Honorable Mary F. Walrath at the Bankruptcy Court, 824 Market Street, 5th Floor,
Courtroom 4, Wilmington, Delaware 19801 on **October 30, 2012 at 11:30 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES TO THE
OBJECTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE
WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF
REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: September 17, 2012
Wilmington, Delaware



Mark D. Collins (No. 2981)
Paul N. Heath (No. 3704)
Julie A. Finocchiaro (No. 5303)
Amanda R. Steele (No. 5530)
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Attorneys for WMI Liquidating Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re
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Debtors.

**NOTICE OF WMI LIQUIDATING TRUST'S EIGHTY-SEVENTH
OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

PLEASE TAKE NOTICE THAT on September 17, 2012, WMI Liquidating Trust (“WMILT”), as successor in interest to Washington Mutual, Inc. (“WMI”) and WMI Investment Corp., formerly debtors and debtors in possession (collectively, the “Debtors”) filed the attached *WMI Liquidating Trust's Eighty-Seventh Omnibus (Non-Substantive) Objection to Claims* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).² By the Objection, the Debtors are seeking to either, disallow, reclassify or reduce your claim(s) (each, a “Claim” and collectively, the “Claims”) as listed in the Objection.

THE OBJECTION SEEKS TO ALTER YOUR RIGHTS. THEREFORE, YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

Critical Information for Claimants Choosing to File a Response to the Objection

Filing a Response. If you oppose the treatment of your Claim(s) set forth in the Objection, and if you are unable to resolve the Objection with the Debtors before the deadline to object, then you must file and serve a written response (the “Response”) to the Objection in accordance with this Notice. If you do not oppose the disallowance of your Claim(s), then you do not need to file a written Response to the Objection and you do not need to appear at the hearing on the Objection (described below).

The deadline for filing a Response is October 8, 2012 at 4:00 p.m. (ET) (the “Response Deadline”).

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 principal offices of WMI Liquidating Trust are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Objection.

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS NOTICE.

Your Response will be deemed timely filed only if the Response is **actually received** on or before the Response Deadline in the office of the clerk of the Bankruptcy Court at the following address:

Clerk of the Court for the
United States Bankruptcy Court
for the District of Delaware
824 North Market Street, 3rd Floor
Wilmington, Delaware 19801

Your Response will be deemed properly-served only if the Response is **actually received** on or before the Response Deadline by the following parties (collectively, the “Notice Parties”):

WEIL, GOTSHAL & MANGES LLP

Attn: Brian S. Rosen
767 Fifth Avenue
New York, New York 10153

RICHARDS, LAYTON & FINGER, P.A.

Attn: Mark D. Collins
Attn: Paul N. Heath
One Rodney Square
920 North King Street
Wilmington, Delaware 19801

Co-Counsel to the Debtors

Contents of Each Response. Every Response to this Objection must contain at a minimum the following information:

- a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of the Objection to which the Response is directed;
- the name of the claimant, his/her/its claim number and a description of the basis for the amount of the claim;
- the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
- any supporting documentation, to the extent it was not included with the Proof of Claim previously filed with the clerk or claims agent, upon which the party will rely to support the basis for and amounts asserted in the Proof of Claim; and
- the name, address, telephone number and fax number of the person(s) (which may be the claimant or the claimant’s legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

Hearing on the Objection. If a Response is properly filed and served in accordance with this notice, a hearing on the Objection and the Response will be held on **October 30, 2012 at 11:30 a.m. (ET)** (the “Hearing”) before The Honorable Mary F. Walrath, United States Bankruptcy Judge, in the Bankruptcy Court located at 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801. If you file a Response to the Objection, then you should plan to appear at the hearing on the Objection. The Debtors, however, reserve the right to continue the hearing with respect to the Objection and the Response.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS
NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED
BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Additional Information

Questions. If you have any questions regarding the Objection and/or if you wish to obtain a copy of the Objection or related documents, please feel free to contact the Debtors’ Voting and Claims Agent, Kurtzman Carson Consultants LLC, by: (a) calling the Debtors’ restructuring hotline at (888) 830-4644 (b) visiting the Debtors’ restructuring website at: <http://www.kccllc.net/wamu> and/or (c) writing to Washington Mutual Claims Processing, c/o Kurtzman Carson Consultants LLC, 2335 Alaska Avenue, El Segundo, California 90245.

Reservation of Rights. Nothing in this notice or the Objection constitutes a waiver of the Debtors’ right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you of the Debtors. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date. In such event, you will receive a separate notice of any such objections.

Dated: September 17, 2012
Wilmington, Delaware



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Facsimile: (212) 310-8007

Attorneys for WMI Liquidating Trust

Exhibit A

Trust Preferred Security Claims

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
145	Ramesh Gulabrai Bharnani Koushilya Ramesh Bharwani	2056	3/27/09	\$ 180,000.00	Individual Trust Preferred	WMI
146	Vashdev Hukumal Lilaramani Pushda V Lilaramani Anil V	2060	3/27/09	\$ 300,000.00	Individual Trust Preferred	WMI
147	Patricia De Guadalupe Paramo & Other Nominee	2067	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
148	Full Time Shipping Limited	2069	3/23/09	Unliquidated	Individual Trust Preferred	WMI
149	Paul Gomez Garza and Other Nominee	2072	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
150	Pong King Han	2088	3/27/09	\$ 40,000.00	Individual Trust Preferred	WMI
151	Yakoob S O Mohammad Siddique	2091	3/18/09	\$ 100,000.00	Individual Trust Preferred	WMI
152	Cheung Mai Ping Jerry & Chan Yuet Wah	2092	3/18/09	\$ 100,000.00	Individual Trust Preferred	WMI
153	Francisco Ramirez And Other Nominee	2127	3/23/09	\$ 350,000.00	Individual Trust Preferred	WMI
154	Simon Koshan	2128	3/23/09	\$ 100,000.00	Individual Trust Preferred	WMI
155	Ana Lorena Ramirez and Other Nominee	2131	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
156	Simone Leticia Damy De Duran Nominee	2132	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
157	Eduardo Enrique Damy Gomez & Others Nominee	2133	3/23/09	\$ 225,000.00	Individual Trust Preferred	WMI
158	Eduardo Enrique Damy Gomez & Others Nominee	2135	3/23/09	\$ 225,000.00	Individual Trust Preferred	WMI
159	Sinogem Limited	2144	3/30/09	\$ 500,000.00	Individual Trust Preferred	WMI
160	Vasco Lizarzu Danese & Nominee	2190	3/26/09	\$ 200,000.00	Individual Trust Preferred	WMI
161	Bertha Guerra de la Fuente Nominee	2201	3/27/09	\$ 100,000.00	Individual Trust Preferred	WMI
162	Palomino Fund Ltd	2290	3/31/09	Unliquidated	Individual Trust Preferred	WMI
163	Appaloosa Investment LPI	2294	3/31/09	Unliquidated	Individual Trust Preferred	WMI
164	Thoroughbred Fund LP	2297	3/31/09	Unliquidated	Individual Trust Preferred	WMI
165	Thoroughbred Master Ltd	2301	3/31/09	Unliquidated	Individual Trust Preferred	WMI
166	Araceli Lizarazu Danese Nominee Scotia Capital Inc Account No 422 98609 13	2316	3/26/09	\$ 150,000.00	Individual Trust Preferred	WMI

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
167	Pong Chiu Han	2328	3/27/09	\$ 40,000.00	Individual Trust Preferred	WMI
168	Wong Yui Keung Marcellus	2330	3/27/09	\$ 150,000.00	Individual Trust Preferred	WMI
169	CDP Global Investments Limited	2344	3/30/09	\$ 250,000.00	Individual Trust Preferred	WMI
170	Centerbridge Credit Partners LP	2374	3/31/09	Unliquidated	Individual Trust Preferred	WMI
171	Davidson Kempner Institutional Partners LP	2389	3/30/09	\$ 15,160,000.00	Individual Trust Preferred	WMI
172	Davidson Kempner Internation Ltd	2396	3/30/09	\$ 19,023,000.00	Individual Trust Preferred	WMI
173	Sun Life Hong Kong Limited	2439	3/31/09	\$16,040,656.00	Individual Trust Preferred	WMI
174	Sun Life Reinsurance Ireland Ltd	2456	3/31/09	\$ 5,012,705.00	Individual Trust Preferred	WMI
175	Janus Systems S A Nominee Scotia Capital Inc	2528	3/30/09	\$ 100,000.00	Individual Trust Preferred	WMI
176	C D P Global Investments Limited VC1545	2598	3/30/09	\$ 250,000.00	Individual Trust Preferred	WMI
177	Josefina Perez de Lopez de Silanes and Other Nominees Scotia Capital Inc Acct 422 01607	2638	3/27/09	\$ 200,000.00	Individual Trust Preferred	WMI
178	Lo Cheong Meng Mak Lai Peng Anita	2639	3/27/09	\$ 100,000.00	Individual Trust Preferred	WMI
179	Grand Cathay Securities Hong Kong Limited Client Account	2696	3/30/09	\$ 2,780,000.00	Individual Trust Preferred	WMI
180	Mr Ho Jen Hsin & Ms Ho Jui Chin	2709	3/30/09	\$ 430,000.00	Individual Trust Preferred	WMI
181	Ma Del Carmem Malagon Almanza & Others	2710	3/30/09	\$ 80,000.00	Individual Trust Preferred	WMI
182	Ko Tak Yin George	2758	3/31/09	\$ 150,000.00	Individual Trust Preferred	WMI
183	Mr Horiike Hiroshi	2765	3/26/09	\$ 430,000.00	Individual Trust Preferred	WMI
184	Lee Sing Kwok	2766	3/26/09	\$ 430,000.00	Individual Trust Preferred	WMI
185	Mr Chen Shou Chong	2767	3/26/09	\$ 90,000.00	Individual Trust Preferred	WMI
186	Alexis K F Yu	2778	3/25/09	\$ 200,000.00	Individual Trust Preferred	WMI
187	Hector Castellanos Ramirez & Other Nominee Scotial Capital Inc Acc No 422 72335 19	2780	3/25/09	\$ 120,000.00	Individual Trust Preferred	WMI
188	Octavio Velasco Margarita & Others Nominee Scotia Capital Inc Acc No 422 72336 18	2781	3/25/09	\$ 120,000.00	Individual Trust Preferred	WMI

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
189	F Javier Diaz Romo & Other Nominee Scotia Capital Inc Account No 422 72427 18	2782	3/25/09	\$ 390,000.00	Individual Trust Preferred	WMI
190	Patricia Ripstein Rosen and Ariana Birman Ripstein Scotia Capital Inc acct 422 73020 17	2783	3/25/09	\$ 90,000.00	Individual Trust Preferred	WMI
191	Victoria Ong Yu Wellington Co Yu	2811	3/31/09	\$ 110,000.00	Individual Trust Preferred	WMI
192	Esther Aranguren DE C&other Nominee Scotia Inc	2871	3/31/09	\$ 100,000.00	Individual Trust Preferred	WMI
193	Adela Nieto Ortega & Other Nominee Account Scotia Capital Inc Acc No 422 01580 10	2899	3/26/09	\$ 35,000.00	Individual Trust Preferred	WMI
194	Eternal Joy Investments Ltd	2902	3/26/09	\$ 430,000.00	Individual Trust Preferred	WMI
195	Javier Ares Valdes and other nominees Scotia Capital Inc acct 422 00281 1 4	2907	3/26/09	\$ 310,000.00	Individual Trust Preferred	WMI
196	Davidson Kempner Distressed Opportunities International Ltd	2937	3/30/09	\$ 5,516,000.00	Individual Trust Preferred	WMI
197	Davidson Kempner Distressed Opportunities International Ltd	2700	3/30/09	\$ 5,516,000.00	Individual Trust Preferred	WMI Investment Corp.
198	Davidson Kempner Distressed Opportunities Fund LP	2938	3/30/09	\$ 2,089,000.00	Individual Trust Preferred	WMI
199	Davidson Kempner Distressed Opportunities Fund LP	2705	3/30/09	\$ 2,089,000.00	Individual Trust Preferred	WMI Investment Corp.
200	Davidson Kempner Partners	2939	3/30/09	\$ 6,852,000.00	Individual Trust Preferred	WMI
201	Davidson Kempner Partners	2690	3/30/09	\$ 6,852,000.00	Individual Trust Preferred	WMI Investment Corp.
202	M H Davidson & Co	2940	3/30/09	\$ 1,360,000.00	Individual Trust Preferred	WMI
203	M H Davidson & Co	2691	3/30/09	\$ 1,360,000.00	Individual Trust Preferred	WMI Investment Corp.
204	Jose Salvador Avila Morales&Others Nominee Scotia Capital In Account NO 422 73424 19	3018	3/24/09	\$ 110,000.00	Individual Trust Preferred	WMI
205	Adela Nieto Ortega&Other Nominee Account Scotia Capital Inc Acct No 422 01577 15	3019	3/24/09	\$ 35,000.00	Individual Trust Preferred	WMI
206	MA Luisa Villanueva N &Others Nominee Scotia Capital Inc Account No 422 72566 19	3020	3/24/09	\$ 30,000.00	Individual Trust Preferred	WMI
207	Gustavo Valenzuela Encinas Nominee Scotia Capital Inc Account No 422 98708 13	3022	3/24/09	\$ 284,000.00	Individual Trust Preferred	WMI
208	Ana Margarita Valenzuela Aguirre Trustee Scotia Capital Inc Acc No 422 98655	3024	3/24/09	\$ 200,000.00	Individual Trust Preferred	WMI

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
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210	Gustavo Valenzuela Encinas Nominee Scotia Capital Inc Account No 422 98710 19	3026	3/24/09	\$ 284,000.00	Individual Trust Preferred	WMI
211	Gustavo Valenzuela Encinas Nominee Scotia Capital Inc Account No 422 98711 18	3028	3/24/09	\$ 284,000.00	Individual Trust Preferred	WMI
212	Gustavo Valenzuela Encinas Nominee Scotia Capital Inc Account No 422 98712 17	3029	3/24/09	\$ 284,000.00	Individual Trust Preferred	WMI
213	Ana Gabriela Lacy Valenzuela Nominee Scotia Capital Inc Account No 422 73391 18	3033	3/24/09	\$ 42,000.00	Individual Trust Preferred	WMI
214	Carmen Aida Lacy Valenzuela Nominee Scotia Capital Inc Account No 422 73390 19	3035	3/24/09	\$ 42,000.00	Individual Trust Preferred	WMI
215	Woo Chong Keung Wallace	3042	3/31/09	\$ 250,000.00	Individual Trust Preferred	WMI
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221	Carlos Delgado Navarro Scotia Capital Inc	3544	4/1/09	\$ 100,000.00	Individual Trust Preferred	WMI
222	Jose de Jesus Franco Quezada & Other Nominee Scotia Capital Inc Acct No 422 01931 16	3600	4/3/09	\$ 100,000.00	Individual Trust Preferred	WMI
223	Sea Lavender Ltd c o Merrill Lynch IntBank Ltd Trust Dept Scotia Capital Inc	3619	4/8/09	\$ 200,000.00	Individual Trust Preferred	WMI
224	Isaac Mitrani y A Scotia Capital Inc	3650	4/15/09	\$ 240,000.00	Individual Trust Preferred	WMI
225	María E Ibarra de Martin & Other Nominee Scotia Capital Inc	3702	5/27/09	\$ 30,000.00	Individual Trust Preferred	WMI
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228	Josefina Flores Ochoa & Other Nominee Scotia Capital Inc	3735	7/6/09	\$ 200,000.00	Individual Trust Preferred	WMI

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230	Liliana Aguilera Sanchez & Others Nominee Scotia Capital	3738	7/6/09	\$ 100,000.00	Individual Trust Preferred	WMI
231	Josefina Flores Ochoa & Other Nominee Scotia Capital Inc	3741	7/9/09	\$ 300,000.00	Individual Trust Preferred	WMI
232	Miguel A Maria Jarsun & Other Nominee Scotia Capital Inc	3742	7/13/09	\$ 80,000.00	Individual Trust Preferred	WMI
233	Independence Life and Annuity Company	2440	3/31/09	\$ 501,271.00	Individual Trust Preferred	WMI
234	Sun Life Assurance Company of Canada (U.S.)	2444	3/31/09	\$ 51,535,624.00	Individual Trust Preferred	WMI
235	Sun Life Financial (U.S.) Reinsurance Co.	2448	3/31/09	\$ 2,005,082.00	Individual Trust Preferred	WMI
236	Sun Life Financial Reinsurance (Barbados) Ltd.	2451	3/31/09	\$ 21,053,361.00	Individual Trust Preferred	WMI
237	Sun Life Insurance and Annuity Company of New York	2457	3/31/09	\$ 4,010,164.00	Individual Trust Preferred	WMI
238	Aurelius Capital Master, Ltd.	2677	3/30/09	\$ 47,200,000.00	Individual Trust Preferred	WMI
239	Aurelius Capital Master, Ltd.	2678	3/30/09	\$ 47,200,000.00	Individual Trust Preferred	WMI Investment Corp.
240	Aurelius Capital Partners, LP	2679	3/30/09	\$ 47,300,000.00	Individual Trust Preferred	WMI Investment Corp.
241	Aurelius Capital Partners, LP	2680	3/30/09	\$ 47,300,000.00	Individual Trust Preferred	WMI
242	Sun Life Assurance Company of Canada	2805	3/31/09	\$ 11,128,205.00	Individual Trust Preferred	WMI
243	Goldman, Sachs & Co.	3202	3/31/09	\$ 35,764,000.00	Individual Trust Preferred	WMI Investment Corp.
244	Goldman, Sachs & Co.	3203	3/31/09	\$ 35,764,000.00	Individual Trust Preferred	WMI
246	Sea Lavender Ltd c/o Merrill Nominee Scotia Capital Inc	3722	5/28/09	\$ 200,000.00	Individual Trust Preferred	WMI
246	SBLI USA Mutual Life Insurance Company Inc	3950	3/5/11	\$ 2,900,000.00	Individual Trust Preferred	WMI

Exhibit B
(Maciel Declaration)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

-----X
: **Chapter 11**
: **Case No. 08-12229 (MFW)**
: **(Jointly Administered)**
:
:
:
-----X

In re
WASHINGTON MUTUAL, INC., et al.,¹
Debtors.

**DECLARATION OF JOHN MACIEL PURSUANT
TO LOCAL RULE 3007-1 IN SUPPORT OF WMI LIQUIDATING TRUST'S
EIGHTY-SEVENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

I, John Maciel, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

I. I am a Senior Director with Alvarez & Marsal North America, LLC ("A&M") and the current Chief Financial Officer of WMI Liquidating Trust ("WMILT"), as successor in interest to Washington Mutual, Inc. ("WMI") and WMI Investment Corp., formerly debtors and debtors in possession (collectively, the "Debtors"). Previously, I was Chief Financial Officer of both of the Debtors. By order, dated November 6, 2008 [D.I. 246], the Debtors were, among other things, authorized to retain A&M as restructuring advisors, and to designate certain other personnel of A&M and its wholly owned subsidiaries, such as myself, to assist in the Debtors' restructuring process. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

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 principal offices of WMILT, as defined herein, are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.

2. In my capacity as Chief Financial Officer of the Debtors and of WMILT, I have been one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors' chapter 11 cases. WMILT's ongoing claims reconciliation process involves the collective effort of a team of A&M and WMILT employees, as well as WMILT's counsel, Weil, Gotshal & Manges LLP, and the WMILT's claims agent, Kurtzman Carson Consultants LLC.

3. I submit this Declaration in support of the *WMI Liquidating Trust's Eighty-Seventh Omnibus (Non-Substantive) Objection to Claims* (the "Eighty-Seventh Omnibus Objection"). Under my direction and/or supervision, each of the claims at issue in the Eighty-Seventh Omnibus Objection was carefully reviewed and analyzed in good faith using due diligence by the appropriate personnel. These efforts resulted in the identification of the Individual Trust Preferred Claims² as identified on Exhibit A to the Eighty-Seventh Omnibus Objection.

4. I have also personally reviewed the Eighty-Seventh Omnibus Objection and exhibits thereto and am, accordingly, familiar with the information contained therein.

Claims Objection

5. To the best of my knowledge, information and belief, the Individual Trust Preferred Claims listed on Exhibit A to the Eighty-Seventh Omnibus Objection represent equity interests and therefore are not claims against Debtors' estates. Accordingly, WMILT requests that those claims be disallowed in their entirety.

6. Additionally, to the best of my knowledge, information and belief, other than a small number of claims arising from holdings of Trust Preferred Securities from the

² Capitalized terms used, but not defined, herein shall have the meaning ascribed to them in the Eighty-Seventh Omnibus Objection.

Cayman Issuer, the Individual Trust Preferred Claims listed on Exhibit A to the Eighty-Seventh Omnibus Objection are also duplicative of the Preferred Funding Trust Claims listed on Exhibit A to the Eighty-Sixth Omnibus Objection. Accordingly, to prevent multiple recoveries by the same claimant, WMILT requests that such Individual Trust Preferred Claims also be disallowed on the grounds that they are duplicative.

7. Based on the foregoing, and to the best of my knowledge, information and belief, the information contained in the Eighty-Seventh Omnibus Objection and exhibits thereto is true and correct, and the relief requested therein is in the best interests of WMILT, the Debtors' estates, and their creditors.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 17, 2012

By: _____

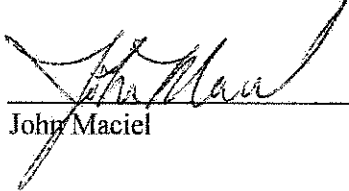

John Maciel

Exhibit C
Proposed Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

-----X
: **Chapter 11**
: **Case No. 08-12229 (MFW)**
: **(Jointly Administered)**
: **Re: Docket No. ____**
-----X

In re
WASHINGTON MUTUAL, INC., et al.,¹
Debtors.

**ORDER GRANTING WMI LIQUIDATING TRUST'S
EIGHTY-SEVENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

Upon the objection, dated September 17, 2012 (the "Eighty-Seventh Omnibus Objection"), of WMI Liquidating Trust ("WMILT"), as successor in interest to Washington Mutual, Inc. ("WMI") and WMI Investment Corp., formerly debtors and debtors in possession (collectively, the "Debtors"), for entry of an order disallowing certain claims filed against the Debtors' estates, all as more fully set forth in the Eighty-Seventh Omnibus Objection; and upon the *Declaration of John Maciel Pursuant to Local Rule 3007-1 in Support of WMI Liquidating Trust's Eighty-Seventh Omnibus (Non-Substantive) Objection to Claims*, dated as of September 17, 2012; and the Court having jurisdiction to consider the Eighty-Seventh Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Eighty-Seventh 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 Eighty-Seventh Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required;

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 principal offices of WMILT, as defined herein, are located at 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.

and the Court having determined that the relief sought in the Eighty-Seventh Omnibus Objection is in the best interest of WMILT, the Debtors' creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Eighty-Seventh Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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

ORDERED that each claim listed on Exhibit A hereto is hereby disallowed in its entirety; and it is further

ORDERED that Kurtzman Carson Consultants, LLC, WMILT's court-appointed claims and noticing agent, is authorized and directed to delete the claims listed in Exhibit A from such official claims register; 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: _____, 2012
Wilmington, Delaware

THE HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

Trust Preferred Security Claims

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
145	Ramesh Gulabrai Bharnani Koushilya Ramesh Bharwani	2056	3/27/09	\$ 180,000.00	Individual Trust Preferred	WMI
146	Vashdev Hukumal Lilaramani Pushda V Lilaramani Anil V	2060	3/27/09	\$ 300,000.00	Individual Trust Preferred	WMI
147	Patricia De Guadalupe Paramo & Other Nominee	2067	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
148	Full Time Shipping Limited	2069	3/23/09	Unliquidated	Individual Trust Preferred	WMI
149	Paul Gomez Garza and Other Nominee	2072	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
150	Pong King Han	2088	3/27/09	\$ 40,000.00	Individual Trust Preferred	WMI
151	Yakoob S O Mohammad Siddique	2091	3/18/09	\$ 100,000.00	Individual Trust Preferred	WMI
152	Cheung Mai Ping Jerry & Chan Yuet Wah	2092	3/18/09	\$ 100,000.00	Individual Trust Preferred	WMI
153	Francisco Ramirez And Other Nominee	2127	3/23/09	\$ 350,000.00	Individual Trust Preferred	WMI
154	Simon Koshan	2128	3/23/09	\$ 100,000.00	Individual Trust Preferred	WMI
155	Ana Lorena Ramirez and Other Nominee	2131	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
156	Simone Leticia Damy De Duran Nominee	2132	3/23/09	\$ 150,000.00	Individual Trust Preferred	WMI
157	Eduardo Enrique Damy Gomez & Others Nominee	2133	3/23/09	\$ 225,000.00	Individual Trust Preferred	WMI
158	Eduardo Enrique Damy Gomez & Others Nominee	2135	3/23/09	\$ 225,000.00	Individual Trust Preferred	WMI
159	Sinogem Limited	2144	3/30/09	\$ 500,000.00	Individual Trust Preferred	WMI
160	Vasco Lizarzu Danese & Nominee	2190	3/26/09	\$ 200,000.00	Individual Trust Preferred	WMI
161	Bertha Guerra de la Fuente Nominee	2201	3/27/09	\$ 100,000.00	Individual Trust Preferred	WMI
162	Palomino Fund Ltd	2290	3/31/09	Unliquidated	Individual Trust Preferred	WMI
163	Appaloosa Investment LPI	2294	3/31/09	Unliquidated	Individual Trust Preferred	WMI
164	Thoroughbred Fund LP	2297	3/31/09	Unliquidated	Individual Trust Preferred	WMI
165	Thoroughbred Master Ltd	2301	3/31/09	Unliquidated	Individual Trust Preferred	WMI
166	Araceli Lizarazu Danese Nominee Scotia Capital Inc Account No 422 98609 13	2316	3/26/09	\$ 150,000.00	Individual Trust Preferred	WMI

	Claimant	Claim Number	Date Filed	Filed Claim Amount	Claim Type	Debtor
167	Pong Chiu Han	2328	3/27/09	\$ 40,000.00	Individual Trust Preferred	WMI
168	Wong Yui Keung Marcellus	2330	3/27/09	\$ 150,000.00	Individual Trust Preferred	WMI
169	CDP Global Investments Limited	2344	3/30/09	\$ 250,000.00	Individual Trust Preferred	WMI
170	Centerbridge Credit Partners LP	2374	3/31/09	Unliquidated	Individual Trust Preferred	WMI
171	Davidson Kempner Institutional Partners LP	2389	3/30/09	\$ 15,160,000.00	Individual Trust Preferred	WMI
172	Davidson Kempner Internation Ltd	2396	3/30/09	\$ 19,023,000.00	Individual Trust Preferred	WMI
173	Sun Life Hong Kong Limited	2439	3/31/09	\$16,040,656.00	Individual Trust Preferred	WMI
174	Sun Life Reinsurance Ireland Ltd	2456	3/31/09	\$ 5,012,705.00	Individual Trust Preferred	WMI
175	Janus Systems S A Nominee Scotia Capital Inc	2528	3/30/09	\$ 100,000.00	Individual Trust Preferred	WMI
176	C D P Global Investments Limited VC1545	2598	3/30/09	\$ 250,000.00	Individual Trust Preferred	WMI
177	Josefina Perez de Lopez de Silanes and Other Nominees Scotia Capital Inc Acct 422 01607	2638	3/27/09	\$ 200,000.00	Individual Trust Preferred	WMI
178	Lo Cheong Meng Mak Lai Peng Anita	2639	3/27/09	\$ 100,000.00	Individual Trust Preferred	WMI
179	Grand Cathay Securities Hong Kong Limited Client Account	2696	3/30/09	\$ 2,780,000.00	Individual Trust Preferred	WMI
180	Mr Ho Jen Hsin & Ms Ho Jui Chin	2709	3/30/09	\$ 430,000.00	Individual Trust Preferred	WMI
181	Ma Del Carmem Malagon Almanza & Others	2710	3/30/09	\$ 80,000.00	Individual Trust Preferred	WMI
182	Ko Tak Yin George	2758	3/31/09	\$ 150,000.00	Individual Trust Preferred	WMI
183	Mr Horiike Hiroshi	2765	3/26/09	\$ 430,000.00	Individual Trust Preferred	WMI
184	Lee Sing Kwok	2766	3/26/09	\$ 430,000.00	Individual Trust Preferred	WMI
185	Mr Chen Shou Chong	2767	3/26/09	\$ 90,000.00	Individual Trust Preferred	WMI
186	Alexis K F Yu	2778	3/25/09	\$ 200,000.00	Individual Trust Preferred	WMI
187	Hector Castellanos Ramirez & Other Nominee Scotial Capital Inc Acc No 422 72335 19	2780	3/25/09	\$ 120,000.00	Individual Trust Preferred	WMI
188	Octavio Velasco Margarita & Others Nominee Scotia Capital Inc Acc No 422 72336 18	2781	3/25/09	\$ 120,000.00	Individual Trust Preferred	WMI

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230	Liliana Aguilera Sanchez & Others Nominee Scotia Capital	3738	7/6/09	\$ 100,000.00	Individual Trust Preferred	WMI
231	Josefina Flores Ochoa & Other Nominee Scotia Capital Inc	3741	7/9/09	\$ 300,000.00	Individual Trust Preferred	WMI
232	Miguel A Maria Jarsun & Other Nominee Scotia Capital Inc	3742	7/13/09	\$ 80,000.00	Individual Trust Preferred	WMI
233	Independence Life and Annuity Company	2440	3/31/09	\$ 501,271.00	Individual Trust Preferred	WMI
234	Sun Life Assurance Company of Canada (U.S.)	2444	3/31/09	\$ 51,535,624.00	Individual Trust Preferred	WMI
235	Sun Life Financial (U.S.) Reinsurance Co.	2448	3/31/09	\$ 2,005,082.00	Individual Trust Preferred	WMI
236	Sun Life Financial Reinsurance (Barbados) Ltd.	2451	3/31/09	\$ 21,053,361.00	Individual Trust Preferred	WMI
237	Sun Life Insurance and Annuity Company of New York	2457	3/31/09	\$ 4,010,164.00	Individual Trust Preferred	WMI
238	Aurelius Capital Master, Ltd.	2677	3/30/09	\$ 47,200,000.00	Individual Trust Preferred	WMI
239	Aurelius Capital Master, Ltd.	2678	3/30/09	\$ 47,200,000.00	Individual Trust Preferred	WMI Investment Corp.
240	Aurelius Capital Partners, LP	2679	3/30/09	\$ 47,300,000.00	Individual Trust Preferred	WMI Investment Corp.
241	Aurelius Capital Partners, LP	2680	3/30/09	\$ 47,300,000.00	Individual Trust Preferred	WMI
242	Sun Life Assurance Company of Canada	2805	3/31/09	\$ 11,128,205.00	Individual Trust Preferred	WMI
243	Goldman, Sachs & Co.	3202	3/31/09	\$ 35,764,000.00	Individual Trust Preferred	WMI Investment Corp.
244	Goldman, Sachs & Co.	3203	3/31/09	\$ 35,764,000.00	Individual Trust Preferred	WMI
246	Sea Lavender Ltd c/o Merrill Nominee Scotia Capital Inc	3722	5/28/09	\$ 200,000.00	Individual Trust Preferred	WMI
246	SBLI USA Mutual Life Insurance Company Inc	3950	3/5/11	\$ 2,900,000.00	Individual Trust Preferred	WMI