

Civil Action No. 08-12229 (MFW)

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* JPMORGAN CHASE BANK, ATTN: TZE LOND KEEPER  
was received by me on *(date)* DECEMBER 4, 2012

I served the subpoena by delivering a copy to the named person as follows: RECEIVED BY  
SUSAN @ JP MORGAN CHASE BANK LEGAL DEPT.  
on *(date)* DECEMBER 4, 2012; or

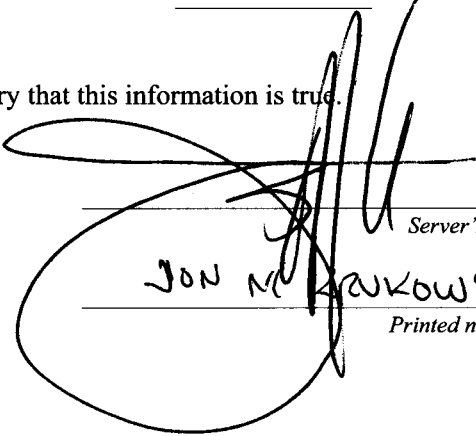
I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: DECEMBER 4, 2012



Server's signature

JON N. KRUKOWSKI

Printed name and title

**JON KRUKOWSKI**  
P.O. Box 985  
Grove City, OH 43123

Server's address

Additional information regarding attempted service, etc:



# UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

IN RE WASHINGTON MUTUAL, INC. et al.

*Plaintiff*

v.

*Defendant*

Civil Action No. 08-12229 (MFW)

(If the action is pending in another district, state where:  
District of Delaware )

## SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: JPMorgan Chase Bank, N.A., Attn: Recordkeeper  
111 Polaris Parkway, Columbus, OH 43240-2031

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See attached Exhibit "A" to this Subpoena to be produced to the undersigned counsel.

Place: The Law Offices of McNair Petroff, LLC  
140 East Town Street, Suite 1070  
Columbus, OH 43215

Date and Time:

01/03/2012 4:00 pm

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 12/04/2012

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

*Ben R. Nyhan*  
*Attorney's signature*

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) See Claimants listed on next page., who issues or requests this subpoena, are:

Benjamin R. Nyhan, Esquire  
McNair Petroff, LLC  
140 East Town Street, Suite 1070  
Columbus, OH 43215  
(614)222-4288 [brn@mcnairpetroff.com](mailto:brn@mcnairpetroff.com)

Stephen W. Spence, Esquire (DE Bar # 2033)  
Phillips, Goldman & Spence, P.A.  
1200 N. Broom Street, Wilmington, DE 19806  
(302) 655-4200 [sws@pgslaw.com](mailto:sws@pgslaw.com)

## Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

### (c) Protecting a Person Subject to a Subpoena.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney’s fees — on a party or attorney who fails to comply.

#### **(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

**(i)** At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

**(ii)** These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

#### **(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the issuing court must quash or modify a subpoena that:

**(i)** fails to allow a reasonable time to comply;

**(ii)** requires a person who is neither a party nor a party’s officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

**(iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

**(iv)** subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

**(i)** disclosing a trade secret or other confidential research, development, or commercial information;

**(ii)** disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party; or

**(iii)** a person who is neither a party nor a party’s officer to incur substantial expense to travel more than 100 miles to attend trial.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

**(i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

**(ii)** ensures that the subpoenaed person will be reasonably compensated.

### (d) Duties in Responding to a Subpoena.

#### **(1) Producing Documents or Electronically Stored Information.**

These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### **(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

**(i)** expressly make the claim; and

**(ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(e) Contempt.** The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty’s failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

## **CLAIMANT LIST**

Todd H. Baker

David Beck

Anthony Bozzuti

Alfred Brooks

Thomas Casey

Debora Horvath

Rajiv Kapoor

Marc Malone

John McMurray

Thomas Morgan

Stephen Rotella

David Schneider

Genevieve Smith

Radha Thompson

Ann Tierney

Robert Williams

Daryl D. David

Kimberly Cannon

Michael Reynoldson

Chandan Sharma

Robert Bjorklund

## **EXHIBIT "A" TO SUBPOENA REQUEST**

### **DEFINITIONS**

For purposes of this Request certain terms are defined as follows:

1. "JPMorgan" shall mean JPMorgan Chase Bank, N.A.
  
2. The terms "you" or "your" shall mean JPMorgan, and/or any of its agents, attorneys, partners, associates, employees, consultants, servants, representatives, investigators and any person or entity acting or who has acted by or on behalf of JPMorgan.
  
3. "Document" and "writing" are used interchangeably and shall mean any written or graphic matter of any kind whatsoever, however produced or reproduced, any electronically or magnetically recorded matter of any kind or character, however produced or reproduced, and any other matter constituting the recording of data or information upon any tangible thing by any means, including but not limited to, the original and any non-identical copy of any of the following: books, records, contracts, agreements, promissory notes, invoices, purchase orders, statements of account, credit and debit memoranda, orders, loan agreements, bills, installment contracts, mortgages, deeds of trust, security agreements, certificates of title, financing statements, instruments, expense accounts, canceled checks, bank statements, bank books, receipt and disbursement journals, tax returns, financial statements, check stubs, drafts, certificates, tabulations, questionnaires, tables, sketches, tax reports, working papers, computer data (including information or programs stored in a computer, whether or not ever printed out or displayed), resumes, medical records, address books, appointment books or telephone logs, notes, speeches, schedules, worksheets, pictures, income statements, profit and loss statements, deposit slips, credit card receipts, records and notations of telephone or personal conversations, conferences, inter-office communications, letters, telexes, partnership agreements, articles of incorporation, catalogue price lists, sound, tape and video recordings, memoranda (including written memoranda of telephone activities), minutes, manuals, diaries, calendars or desk pads, calendar or diary entries, scrapbooks, notebooks, correspondence, bulletins, circulars, policies, forms, pamphlets, notices, statements, journals, postcards, letters, emails, text messages, social media posts, telegrams, facsimile transmissions, reports, magazines, booklets, brochures, instructions, interoffice communications, Photostats, microfilm, microfiche, maps, deposition transcripts, pleadings, orders, releases, appraisals, estimates, valuations, opinions, studies, analyses, summaries, drawings, blueprints, photographs, negatives, graphs, charts, publicly

viewable websites, non-public websites (such as company or employee intranets) and other data, information or statistics contained within any data storage modules, tapes, discs or any other memory devices (including flash drives, CDs, DVDs, or internet-based data storage or data backup or similar methods of storage for information, data and programs) or any other information retrievable on storage systems (including computer generated reports and printouts).

4. “Communication” or “communication” shall mean any spoken communication, contact, oral or written, formal or informal at any time or place or under any circumstances whatsoever, whereby information of any nature was transmitted, recorded, or transferred (whether telephonic, written, in person or otherwise). Where you are requested to identify or list any communications, your identification or list of such communications shall require you separately as to each communication, to identify the mode of such communication, to identify the persons who participated in such communication, to identify the persons who overheard or had access to such communication, and to state the date of such communication, the time and/or place of such communication, and the subject matter of such communication.

5. “Identify” or “state the identity of” shall have the following meaning when used in the following contexts:

a. When used in connection with a natural person, you are required to state his or her: (a) full name; (b) present or last known home address (including street name, number, city and state); (c) present position, business affiliation and job description and, if unknown, so state and set forth the corresponding last known instance of such information; (d) position, business affiliation and job description at the time in question, with respect to the Interrogatory or other request involved.

b. When used in connection with a document or writing, you are required to state in the answer in each instance: (a) whether or not such document is known to be in existence at the time of the answer; (b) the date of the document; (c) type of document (*e.g.* letter, memorandum, computer printout, estimate, etc.); (d) identity of the author(s), addressee(s) and any other person to whom the document was shown or distributed; (e) any filing or identifying number; and (f) the present or last known location and/or custodian thereof. If any such document was, but is no longer in the possession of or subject to control of JPMorgan or any affiliated business entity, state what and when disposition was made of it.

c. When used in connection with an oral communication, you are required to state in the answer in each instance: (a) the identity of each person communicating;

(b) the identity of the recipient(s) and intended recipient(s) of the communication; (c) the identity of each person present or otherwise aware of the substance of the communication; (d) the date and the place where it was made; ( e) the identity of any document or writing that embodies, includes, reflects, concerns, relates, refers to or is based upon such oral communication; and (f) a detailed description of the substance of the communication.

d. When used in connection with a transaction, you are required to state in the answer in each instance: (a) a description of the property or thing that is the subject of the transaction; (b) the identity of the parties to the transaction; (c) the date of the transaction; (d) the place or site where the transaction took place; (e) the location of the property or thing that was the subject to the transaction at the time the transaction took place; (f) the identity of all persons who have knowledge of the transaction; and (g) identify all documents that refer or relate to the transaction.

6. The “WMILT” shall mean the Washington Mutual, Inc. Liquidating Trust and its agents, employees, consultants, servants, attorneys, accountants, partners, associates, representatives and any person or entity acting or who has acted on its behalf.

7. The “Debtors” shall mean, collectively and as appropriate, Washington Mutual, Inc. and WMI Investment Corp.

8. “Petition Date” shall mean September 26, 2008.

9. “Claimants” shall mean the following persons Todd H. Baker, David Beck, Anthony Bozzuti, Alfred Brooks, Thomas Casey, Debora Horvath, Rajiv Kapoor, Marc Malone, John McMurray, Thomas Morgan, Stephen Rotella, David Schneider, Genevieve Smith, Radha Thompson, Ann Tierney, Robert Williams, Daryl D. David, Kimberly Cannon, Michael Reynoldson, Chandan Sharma, and Robert Bjorklund.

10. “WAMU” shall mean WMI and any of its bank or non-bank subsidiaries or affiliates.

11. “WMI” shall mean Washington Mutual, Inc.

12. “WMB, FSB” shall mean Washington Mutual Bank, FSB.

13. “WMB” shall mean Washington Mutual Bank.

14. “SERAP” shall mean the WAMU Supplemental Executive Retirement Accumulation Plan.

15. “ETRIP” shall mean the WAMU Executive Target Retirement Income Plan.

16. “HR Committee” shall mean any board, committee, or department, including the Human Resources Committee of the Board of Directors for WMI, of WMI or any of its bank or non-bank subsidiaries and affiliates which determined or managed employee benefits, employee salaries, severance, bonuses, employment agreements, change-in-control agreements, retirement benefits, and other like human resources related functions.

17. “WAMU Executive Severance Plan” shall mean the WAMU Executive Officer Severance Plan, effective as of April 1, 2008, and/or any previous versions which it may have replaced or any amendments or alterations thereto.

18. “WAMU Severance Plan” shall mean the WAMU Severance Plan, effective as of August 1, 2007, and/or any previous versions which it may have replaced or any amendments or alterations thereto.

19. “WAMU Change in Control Agreement” shall mean the Change in Control Agreement, dated December 2007, between WMI and any employee, and/or any previous version and/ or any amendment or alteration thereto.

20. “Employee Agreements” shall mean any employment agreement, change in control agreement, special bonus opportunity offer, and/or long term incentive agreement.



## **DOCUMENTS REQUESTED**

1. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the ETRIP during the period January 1, 2006 through December 31, 2009, including but not limited to reports prepared by outside consultants, memoranda to the Board of Directors for WMI and/or the HR COMMITTEE.
2. Produce all DOCUMENTS and all COMMUNICATIONS from Towers Watson formerly known as Towers Perrin (“Towers Perrin”) including but not limited to reports prepared by Towers Perrin for JPMorgan, WAMU related to WMI, WMB, WMB, FSB and/or WMILT from 2007 through 2011.
3. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for David Beck.
4. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Stephen Rotella.
5. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for John McMurray.
6. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Alfred Brooks.
7. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Thomas Casey.
8. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Debora Horvath.
9. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for David Schneider.
10. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Genevieve Smith.

11. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Robert Williams.

12. Produce all DOCUMENTS and all COMMUNICATIONS relied upon by WMI, WMB, WMB, FSB and/or WMILT to calculate the ETRIP distribution amounts for Daryl David.

13. Produce all DOCUMENTS that REFER OR RELATE TO WMI's, WMB's, or WMB, FSB's July 17, 2007 Memo to the WMI Board of Directors and HR COMMITTEE from Daryl David regarding: Change-in-Control Agreements, and all attachments thereto, including the DOCUMENTS from Towers Perrin.

14. Produce all DOCUMENTS that REFER OR RELATE TO WMI's, WMB's and WMB, FSB's Resolutions of the HR COMMITTEE regarding Amendments of Change-in-Control Agreements for the period January 1, 2004 through December 31, 2008.

15. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO press releases that were disseminated by JPMorgan about WAMU or by WMB or WMB, FSB in 2007 and 2008.

16. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO human resource reports that were disseminated by WMI, WMB, FSB and/or WMB in 2007 and 2008.

17. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the SERAP during the period January 2006 through December 2009, including but not limited to reports prepared by outside consultants, memoranda to the Board of Directors for WMI, WMB, WMB, FSB, A&M and/or the HR COMMITTEE.

18. Produce all DOCUMENTS that REFER OR RELATE TO the WAMU Severance Plan, including but not limited to any reports, reports prepared by outside consultants, memoranda addressing the need for and adoption of the WAMU Severance Plan and amendments to the WAMU Severance Plan during the period January 2006 through December 2012.

19. Produce all DOCUMENTS that REFER OR RELATE TO the WAMU Executive Severance Plan, including but not limited to any reports, reports prepared by outside consultants, memoranda addressing the need for and adoption of the WAMU Executive Severance Plan and amendments to the WAMU Executive Severance Plan during the period January 2006 through December 2012.

20. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the WAMU 2008 Executive Committee Leadership Bonus Plan.

21. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the 2007 WAMU Equity My Way Election Form Levels 1-3.

22. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all memorandum, reports or recommendations to the HR COMMITTEE during the years 2006 through 2008.

23. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all memoranda prepared by or from the HR COMMITTEE during the years 2006 through 2008.

24. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Todd H. Baker.

25. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for David Beck.

26. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Anthony Bozzuti.

27. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Alfred Brooks.

28. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Thomas Casey.

29. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Debora Horvath.

30. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Rajiv Kapoor.

31. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for John McMurray.

32. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Thomas Morgan.

33. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Stephen Rotella.

34. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for David Schneider.

35. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Genevieve Smith.

36. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Radha Thompson.

37. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Ann Tierney.

38. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Marc Malone.

39. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Robert Williams.

40. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Daryl David.

41. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Kimberly Cannon.

42. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Michael Reynoldson.

43. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Chandan Sharma.

44. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO any and all employment files maintained by JPMorgan, WMB, FSB, WMB and/or WMI for Robert Bjorklund.

45. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Todd Baker.

46. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to David Beck.

47. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Anthony Bozzuti.

48. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Alfred Brooks.

49. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO employment offer letter from WAMU to Thomas Casey.

50. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Debora Horvath.

51. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Rajiv Kapoor.

52. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to John McMurray.

53. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Thomas Morgan.

54. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Stephen Rotella.

55. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to David Schneider.

56. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Genevieve Smith.

57. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Radha Thompson.

58. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Ann Tierney.

59. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Marc Malone.

60. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Robert Williams.

61. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Daryl David.

62. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Michael Reynoldson.

63. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Kimberly Cannon.

64. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO an employment offer letter from WAMU to Chandan Sharma.

65. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO employment offer letter from WAMU to Michael Bjorklund.

66. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the WAMU Severance Plan Summary Plan Description (SPD) effective as of April 1, 2007.

67. Produce all DOCUMENTS and COMMUNICATIONS that REFER OR RELATE TO the WAMU Executive Severance Plan Summary Plan Description (SPD) effective as of April 1, 2007.

68. Produce the WAMU employment offer letter executed by Todd Baker.

69. Produce the WAMU employment offer letter executed by David Beck.

70. Produce the WAMU employment offer letter executed by Anthony Bozzuti.

71. Produce the WAMU employment offer letter executed by Alfred Brooks.

72. Produce the WAMU employment offer letter executed by Thomas Casey.
73. Produce the WAMU employment offer letter executed by Debora Horvath.
74. Produce the WAMU employment offer letter executed by Rajiv Kapoor.
75. Produce the WAMU employment offer letter executed by John McMurray.
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85. Produce the WAMU employment offer letter executed by Michael Reynoldson.
86. Produce the WAMU employment offer letter executed by Kimberly Cannon.
87. Produce the WAMU employment offer letter executed by Chandan Sharma.
88. Produce the WAMU employment offer letter executed by Robert Bjorklund.
89. Produce any all DOCUMENTS created by Rewards & Benefits Corporate Human Resources regarding WAMU, including but not limited to Reward Summaries, emails, and memorandum from January 1, 2006 to December 31, 2009.
90. Produce all DOCUMENTS or COMMUNICATIONS which are the WMI, WMB, or WMB, FSB Human Resources Department Data base in existence as of September 25, 2008.
91. Produce any and all special bonus opportunity letters sent by WAMU to Debora Horvath.
92. Produce any and all special bonus opportunity letters sent by WAMU to Todd Baker.
93. Produce any and all special bonus opportunity letters sent by WAMU to John McMurray.
94. Produce any and all special bonus opportunity letters sent by WAMU to David Schneider.
95. Produce any and all special bonus opportunity letters sent by WAMU to Alfred Brooks.

96. Produce any and all special bonus opportunity letters sent by WAMU to Thomas Morgan.
97. Produce any and all special bonus opportunity letters sent by WAMU to Marc Malone.
98. Produce any and all special bonus opportunity letters sent by WAMU to Robert Williams.
99. Produce any and all special bonus opportunity letters sent by WAMU to Genevieve Smith.
100. Produce any and all special bonus opportunity letters sent by WAMU to Ann Tierney.
101. Produce any and all special bonus opportunity letters sent by WAMU to David Beck.
102. Produce any and all special bonus opportunity letters sent by WAMU to Anthony Bozzuti.
103. Produce any and all special bonus opportunity letters sent by WAMU to Alfred Brooks.
104. Produce any and all special bonus opportunity letters sent by WAMU to Thomas Casey.
105. Produce any and all special bonus opportunity letters sent by WAMU to Rajiv Kapoor.
106. Produce any and all special bonus opportunity letters sent by WAMU to Thomas Morgan.
107. Produce any and all special bonus opportunity letters sent by WAMU to Radha Thompson.
108. Produce any and all special bonus opportunity letters sent by WAMU to Daryl David.
109. Produce any and all special bonus opportunity letters sent by WAMU to Michael Reynoldson.
110. Produce any and all special bonus opportunity letters sent by WAMU to Kimberly Cannon.
111. Produce any and all special bonus opportunity letters sent by WAMU to Chandan Sharma.



112. Produce any and all special bonus opportunity letters sent by WAMU to Robert Bjorklund

113. Produce any and all templates used by WAMU Rewards & Benefits Corporate Human Resources, including but not limited to templates for the Reward Summaries, offer letters, and WAMU Equity My Way Election Forms that were used to create documents disseminated to employees for the period of January 1, 2006 to December 31, 2008.

114. Produce any and all DOCUMENTS and COMMUNICATIONS regarding the administration, organization, funding or other details of the WAMU Executive Severance Plan, WAMU Severance Plan, WAMU ETRIP, and the WMI and WMB Change in Control Agreements.

115. Produce the 2007 WAMU Equity My Way Election Form executed by any of the Claimants.

116. Produce all Rewards Summary letters and or notices sent by WAMU to Todd Baker.

117. Produce all Rewards Summary letters and or notices sent by WAMU to David Beck.

118. Produce all Rewards Summary letters and or notices sent by WAMU to Anthony Bozzuti.

119. Produce all Rewards Summary letters and or notices sent by WAMU to Alfred Brooks.

120. Produce all Rewards Summary letters and or notices sent by WAMU to Thomas Casey.

121. Produce all Rewards Summary letters and or notices sent by WAMU to Debora Horvath.

122. Produce all Rewards Summary letters and or notices sent by WAMU to Rajiv Kapoor.

123. Produce all Rewards Summary letters and or notices sent by WAMU to Marc Malone.

124. Produce all Rewards Summary letters and or notices sent by WAMU to John McMurray.

125. Produce all Rewards Summary letters and or notices sent by WAMU to Thomas Morgan.

126. Produce all Rewards Summary letters and or notices sent by WAMU to David Schneider.
127. Produce all Rewards Summary letters and or notices sent by WAMU to Genevieve Smith.
128. Produce all Rewards Summary letters and or notices sent by WAMU to Radha Thompson.
129. Produce all Rewards Summary letters and or notices sent by WAMU to Ann Tierney.
130. Produce all Rewards Summary letters and or notices sent by WAMU to Robert Williams.
131. Produce all Rewards Summary letters and or notices sent by WAMU to Stephen Rotella.
132. Produce all Rewards Summary letters and or notices sent by WAMU to Daryl David.
133. Produce all Rewards Summary letters and or notices sent by WAMU to Michael Reynoldson.
134. Produce all Rewards Summary letters and or notices sent by WAMU to Kimberly Cannon.
135. Produce all Rewards Summary letters and or notices sent by WAMU to Chandan Sharma.
136. Produce all Rewards Summary letters and or notices sent by WAMU to Robert Bjorkland.
137. Produce any and all letters, e-mails, COMMUNICATIONS, DOCUMENTS from YOU to WMI.
138. Produce any and all letters, e-mails, COMMUNICATIONS, DOCUMENTS from YOU to WMB.
139. Produce any and all letters, e-mails, COMMUNICATIONS, DOCUMENTS from YOU to WMI that refer to or discuss any of the Claimants.
140. Produce any and all letters, e-mails, COMMUNICATIONS, DOCUMENTS from YOU to WMB that refer to or discuss any of the Claimants.