

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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<i>In re</i>	:
	:
WASHINGTON MUTUAL, INC., <u>et al.</u> , ¹	:
	:
Debtors.	:
	:
-----X	
-----X	
WMI LIQUIDATING TRUST	:
	:
Plaintiff,	:
	:
v.	:
-----X	
ANTHONY BOZZUTI,	:
	:
	:
-----X	
CHANDAN SHARMA,	:
	:
	:
-----X	
EDWARD F. BACH,	:
	:
	:
-----X	
HENRY J. BERENS,	:
	:
	:
-----X	
JOHN M. BROWNING,	:
	:
	:
-----X	

Chapter 11
Case No. 08-12229 (MFW)
(Jointly Administered)
Re: Docket No. 10973

Adversary Proc. No. 10-53131 (MFW)
Re: Docket No. 76

Adversary Proc. No. 10-53147 (MFW)
Re: Docket No. 72

Adversary Proc. No. 10-53132 (MFW)
Re: Docket No. 90

Adversary Proc. No. 10-53134 (MFW)
Re: Docket No. 96

Adversary Proc. No. 10-53156 (MFW)
Re: Docket No. 81

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.



KEITH O. FUKUI,	:	Adversary Proc. No. 10-53139 (MFW)
	:	
	:	Re: Docket No. 89
-----X		
MARC MALONE,	:	Adversary Proc. No. 10-53152 (MFW)
	:	
	:	Re: Docket No. 97
-----X		
MICHAEL R. ZARRO,	:	Adversary Proc. No. 10-53143 (MFW)
	:	
	:	Re: Docket No. 96
-----X		
RACHEL M. MILEUR a/k/a RACHELLE M. MILEUR,	:	Adversary Proc. No. 10-53133 (MFW)
	:	
	:	Re: Docket No. 73
-----X		
ROBERT C. HILL,	:	Adversary Proc. No. 10-53153 (MFW)
	:	
	:	Re: Docket No. 100
-----X		
STEPHEN E. WHITTAKER,	:	Adversary Proc. No. 10-53150 (MFW)
	:	
	:	Re: Docket No. 91
-----X		
THOMAS E. MORGAN,	:	Adversary Proc. No. 10-53154 (MFW)
	:	
	:	Re: Docket No. 79
-----X		
ANN TIERNEY	:	Adversary Proc. No. 11-53299 (MFW)
	:	
	:	Re: Docket No. 44
-----X		
TODD H. BAKER	:	Adversary Proc. No. 11-54031 (MFW)
	:	
	:	Re: Docket No. 36
-----X		
RICHARD STRAUCH	:	Adversary Proc. No. 12-50848 (MFW)
	:	
	:	Re: Docket No. 25
-----X		
GENNADIY DARAKHOVSKIY	:	Adversary Proc. No. 12-50902 (MFW)
	:	
	:	Re: Docket No. 21
-----X		
ROBERT BJORKLUND, DARYL DAVID, MARY BETH DAVIS, MICHELE GRAU-IVERSEN,	:	Adversary Proc. No. 12-50965 (MFW)
	:	
	:	Re: Docket No. 36

DEBORA HORVATH, JEFFREY JONES, :
JOHN MCMURRAY, CASEY NAULT, :
MICHAEL REYNOLDSON, :
DAVID SCHNEIDER, DAVID TOMLINSON, :
BRUCE ALAN WEBER, AND :
JEFFREY WEINSTEIN, :
 :
Defendants. :
 -----X

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING AGREED ORDER
 AMENDING SCHEDULING ORDERS WITH RESPECT TO
EMPLOYEE CLAIMS HEARING AND ADVERSARY PROCEEDINGS**

The undersigned certifies as follows:

1. On October 15, 2012, the Court entered the *Agreed Order Establishing Procedures and Deadlines Concerning Hearing on Employee Claims and Discovery in Connection Therewith* (the “Employee Claims Scheduling Order”).
2. On November 13, 2012, the Court entered the *Scheduling Order* with respect to the above-captioned adversary proceedings (the “Adversary Proceeding Scheduling Order,” together with the Employee Claims Scheduling Order, the “Scheduling Orders”).
3. On January 4, 2013, WMI Liquidating Trust (“WMILT”) filed the *Certification of Counsel Regarding Agreed Order Amending Scheduling Orders With Respect to Employee Claims Hearing and Adversary Proceedings* [Docket No. 10973] (the “Certification of Counsel”)² requesting that the Court enter an order amending the Scheduling Orders.
4. Following the Response Time, WMILT has received eight (8) additional responses from *pro se* claimants. All such claimants agreed to the extension of deadlines and dates in the Scheduling Orders. Of those eight claimants, five (5) either preferred or otherwise

² Capitalized terms used herein, but not otherwise defined, shall have the meaning ascribed to such term in the Certification of Counsel

agreed to the sixty (60) day extension of periods included in the Proposed Order. The three remaining claimants preferred a thirty (30) day extension period. WMILT believes that such shorter extension is unrealistic given the amount of discovery that remains to be completed prior to the Hearing (as such term is defined in the Employee Claims Scheduling Order).

WHEREFORE WMILT respectfully requests that the Court enter the Proposed Order, attached to the Certification of Counsel as Exhibit A, on or before January 7, 2013, which date is prior to or concurrent with any current deadline to object or respond to Permitted Written Discovery served pursuant to the Scheduling Orders.

Dated: January 6, 2013
Wilmington, Delaware

/s/ Amanda R. Steele
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Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
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Attorneys for WMI Liquidating Trust