

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:**

WASHINGTON MUTUAL, INC., et al.,	)	
	)	<b>Chapter 11</b>
	)	
<b>Debtors.</b>	)	<b>Case No. 08-12229</b>
	)	
	)	Re: Docket Nos. 11032, 11141
	)	
	)	<b>Hearing Date: March 25, 2013 at</b>
	)	<b>10:30 a.m. (EDT)</b>

**JOINDER OF MICHAEL R. ZARRO  
TO JOINT OBJECTION OF JOHN MCMURRAY,  
ALFRED BROOKS, TODD BAKER, THOMAS CASEY, DEBORAH HORVATH,  
DAVID SCHNEIDER, STEPHEN ROTELLA, SEAN BECKETTI, DAVID  
BECK, ANTHONY BOZZUIT, RAJIV KAPOOR, MARC MALONE, THOMAS E.  
MORGAN, GENEVIEVE SMITH, RADHA THOMPSON, ANN TIERNEY,  
DARYL DAVID, KIMBERLY CANNON, MICHAEL REYNOLDSON, CHANDAN  
SHARMA AND ROBERT BJORKLUND TO WMI LIQUIDATING TRUST'S  
MOTION FOR LEAVE TO AMEND THE FIFTH, SIXTH, SEVENTY-NINTH,  
EIGHTIETH, EIGHTY-FIRST, EIGHTY-SECOND, EIGHTY-FOURTH,  
EIGHTY-FIFTH, AND EIGHTY-EIGHTH OMNIBUS OBJECTIONS TO CLAIMS**

Michael R. Zarro (“Claimant”), by and through his undersigned counsel, hereby joins the Joint Objection of John McMurray, Alfred Brooks, Todd Baker, Thomas Casey, Deborah Horvath, David Schneider, Stephen Rotella, Sean Beckett, David Beck, Anthony Bozzuit, Rajiv Kapoor, Marc Malone, Thomas E. Morgan, Genevieve Smith, Radha Thompson, Ann Tierney, Daryl David, Kimberly Cannon, Michael Reynoldson, Chandan Sharma and Robert Bjorklund to WMI Liquidating Trust’s Motion for Leave to Amend the Fifth, Sixth, Seventy-Ninth, Eightieth, Eighty-First, Eighty-Second, Eighty-Fourth, Eighty-Fifth, and Eighty-Eighth Omnibus Objections to Claims (D.I. 11141) (the “Joint Objection”).

**Background**



On or about March 17, 2009, Claimant filed a claim, which was assigned Proof of Claim No. 1743 (the “Claim”) against the Debtors’ bankruptcy estates and, post-confirmation, against the WMI Liquidating Trust (“WMILT”). WMILT objects to the allowance of the Claim, as set out in the 6<sup>th</sup> Omnibus (Substantive) Objection to Claims (the “6<sup>th</sup> Objection”) and the Seventy-Ninth Omnibus (Substantive) Objection to Claims (the “79<sup>th</sup> Objection,” and together with the 6<sup>th</sup> Objection, the “Omnibus Objections”).

**Relief Requested**

For the reasons fully set out in the Joint Objection, Claimant moves this Court for the entry of an Order denying WMI Liquidating Trust’s Motion for Leave to Amend the Fifth, Sixth, Seventy-Ninth, Eightieth, Eighty-First, Eighty-Second, Eighty-Fourth, Eighty-Fifth, and Eighty-Eighth Omnibus Objections to Claims (D.I. 11032) (“the Motion”).

Respectfully submitted,  
**WEIR & PARTNERS LLP**

/s/ Kenneth E. Aaron  
Kenneth E. Aaron (No. 4043)  
824 N. Market Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 652-8181  
[kaaron@weirpartners.com](mailto:kaaron@weirpartners.com)

Abbe A. Miller, Esquire (admitted *pro hac vice*)  
The Widener Building, Suite 500  
1339 Chestnut Street  
Philadelphia, PA 19107  
Telephone: (215) 241-7723  
[abbe.miller@weirpartners.com](mailto:abbe.miller@weirpartners.com)  
*Attorneys for Movant, Michael R. Zarro*

Dated: March 18, 2013  
Wilmington, DE