UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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	:
In re	:
	:
WASHINGTON MUTUAL, INC., <u>et al.</u> , ¹	:
	:
Debtors.	:
	:
v	

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

WMI LIQUIDATING TRUST'S LIST OF POTENTIAL WITNESSES PURSUANT TO THE SCHEDULING ORDER WITH RESPECT TO HEARING ON <u>EMPLOYEE CLAIMS</u>

WMI Liquidating Trust ("<u>WMILT</u>"), as successor in interest to Washington Mutual, Inc. and WMI Investment Corp. (collectively, the "<u>Debtors</u>"), by and through its undersigned counsel, hereby submits its list of potential witnesses that it may present pursuant to the Agreed Order Establishing Procedures and Deadlines Concerning Hearing on Employee Claims and Discovery In Connection Therewith, dated October 15, 2012 [D.I. 10777] (as amended, the "<u>Scheduling Order</u>"). Pursuant to the Scheduling Order, WMILT reserves the right to present its witnesses by live examination, a proffer of testimony, use of deposition testimony pursuant to Bankruptcy Rule 7032, or the submission of affidavits. WMILT further reserves the right to not call any witness(es) identified on this list, to revise and/or supplement this list upon the completion of discovery, and to call any and all persons identified in the witness lists submitted by the Claimants pursuant to the Scheduling Order. WMILT further reserves the right to object to any testimony offered by or elicited from any of the witnesses listed 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.



WITNESSES WMILT MAY CALL

Name	Title	General Area
Susan C. Allison	Claimant	Proofs of claims in these proceedings.
Edward F. Bach	Claimant	Proofs of claims in these proceedings.
Todd H. Baker	Claimant	Proofs of claims in these proceedings.
Melba Ann Bartels	Claimant	Proofs of claims in these proceedings.
Robert Batt	Claimant	Proofs of claims in these proceedings.
David Beck	Claimant	Proofs of claims in these proceedings.
Sean Becketti	Claimant	Proofs of claims in these proceedings.
Henry J. Berens	Claimant	Proofs of claims in these proceedings.
Bruce W. Bivert	Claimant	Proofs of claims in these proceedings.
Robert C. Bjorklund	Claimant	Proofs of claims in these proceedings.
David Bonderman	BOD Member	BOD consideration and discussion of certain relevant issues.
Robert C. Boxberger	Claimant	Proofs of claims in these proceedings.
Anthony Joseph Bozzuti	Claimant	Proofs of claims in these proceedings.
Gary P. Brady	Claimant	Proofs of claims in these proceedings.
Carey M. Brennan	Claimant	Proofs of claims in these proceedings.
Alfred R. Brooks	Claimant	Proofs of claims in these proceedings.
Curt Brouwer	Claimant	Proofs of claims in these proceedings.
John M. Browning	Claimant	Proofs of claims in these proceedings.

Gregory G. Camas	Claimant	Proofs of claims in these proceedings.
Kimberly A. Cannon	Claimant	Proofs of claims in these proceedings.
Gregory Alan Carlisle	Claimant	Proofs of claims in these proceedings.
Thomas W. Casey	Claimant	Proofs of claims in these proceedings.
Fay Chapman	General Counsel	Aspects of employee agreements and/or benefits plans.
Karen Crandall	Senior Manager, Enterprise Rewards	Aspects of employee agreements and/or benefits plans and determination of payments to be made to Claimants upon termination of their employment with WMI or any subsidiary or affiliate.
Gennadiy Darakhovskiy	Claimant	Proofs of claims in these proceedings.
Daryl D. David	Claimant	Proofs of claims in these proceedings and aspects of employee agreements and/or benefits plans.
Mary Beth Davis	Claimant	Proofs of claims in these proceedings.
Craig Day	Counsel	Aspects of employee agreements and/or benefits plans.
Kaycee Dewar	Senior Manager, Policy & Services, Corporate Accounting Group	Aspects of employee agreements and/or benefits plans.
Robbyn Dewar	Manager of Deferred Compensation Plan Operations, HR Rewards and Benefits	Aspects of employee agreements and/or benefits plans and change in control ² issues.
Jake D. Domer	Claimant	Proofs of claims in these proceedings.
Cathy Doperalski	Credit and Corporate Compliance	Relevant banking and FDIC regulations.

² WMILT asserts that the determination of whether a change in control occurred involves a legal question. The witnesses listed above with respect to change in control issues will testify only as to the facts relevant to establish whether a change in control occurred.

Lynn DuBey	Associate General Counsel	Aspects of employee agreements and/or benefits plans.
Duane Duck	Claimant	Proofs of claims in these proceedings.
Andrew J. Eschenbach	Claimant	Proofs of claims in these proceedings.
Camille J. Everett	Claimant	Proofs of claims in these proceedings.
Jacqueline Ferguson	Claimant	Proofs of claims in these proceedings.
William Finzer	Claimant	Proofs of claims in these proceedings.
Alan Fishman	Chief Executive Officer	BOD consideration and discussion of certain relevant issues and the JPMC transaction.
Stephen Frank	BOD Member, HR Committee Member	BOD consideration and discussion of certain relevant issues.
Stephen Fortunato	Claimant	Proofs of claims in these proceedings.
Brian T. Foster	Claimant	Proofs of claims in these proceedings.
Peter Freilinger	Claimant	Proofs of claims in these proceedings.
Keith O. Fukui	Claimant	Proofs of claims in these proceedings.
Matthew Gaspard	Claimant	Proofs of claims in these proceedings.
Michele S. Grau- Iversen	Claimant	Proofs of claims in these proceedings.
Tracy Hannuksela	Senior HR Business Partner, Corporate Finance	Aspects of employee agreements and/or benefits plans.
Robert C. Hill	Claimant	Proofs of claims in these proceedings.
Debora D. Horvath	Claimant	Proofs of claims in these proceedings.
Jeffrey R. Jones	Claimant	Proofs of claims in these proceedings.
JPMC Representative		The basis for any relevant payments made to

		claimants and the JPMC transaction.
Rajiv Kapoor	Claimant	Proofs of claims in these proceedings.
Kenneth Kido	Claimant	Proofs of claims in these proceedings.
Kerry Killinger	CEO of WMI, Former Chair of BOD	BOD consideration and discussion of certain relevant issues and executive committee decisions and actions.
Stewart M. Landefeld	BOD Member	BOD consideration and discussion of certain relevant issues.
Suzanne R. Lehrberger	Claimant	Proofs of claims in these proceedings.
Thomas Leppert	BOD Member	BOD consideration and discussion of certain relevant issues.
Charles Lillis	BOD Member, HR Committee Member	BOD consideration and discussion of certain relevant issues.
Ronald M. Lowery	Claimant	Proofs of claims in these proceedings.
John Maciel	Chief Financial Officer of WMILT; A&M	Change in control and wrong party issues.
Marc Malone	Claimant	Proofs of claims in these proceedings.
Phillip Matthews	BOD Member, HR Committee Member	BOD consideration and discussion of certain relevant issues.
Michelle McCarthy	Claimant	Proofs of claims in these proceedings.
Susan McCarthy	Claimant	Proofs of claims in these proceedings.
John P. McMurray	Claimant	Proofs of claims in these proceedings.
Randy Melby	Claimant	Proofs of claims in these proceedings.
Joe Anthony Melo	Claimant	Proofs of claims in these proceedings.
Robert G. Merritt	Claimant	Proofs of claims in these proceedings.

Lee Meyerson	Simpson Thacher	BOD consideration and discussion of certain relevant issues.
Rachelle M. Mileur	Claimant	Proofs of claims in these proceedings.
Regina Montoya	BOD Member	BOD consideration and discussion of certain relevant issues.
Julie Morales	Claimant	Proofs of claims in these proceedings.
Thomas E. Morgan	Claimant	Proofs of claims in these proceedings.
Karla Morrison	Benefits Analyst, Rewards & Benefits, Corporate Human Resources	Aspects of employee agreements and/or benefits plans.
John M. Murphy	Claimant	Proofs of claims in these proceedings.
Michael Murphy	BOD Member	BOD consideration and discussion of certain relevant issues.
Casey M. Nault	Claimant	Proofs of claims in these proceedings and aspects of employee agreements and/or benefits plans.
Connie Pettit	Relocation Administrator, Payroll, Corporate Human Resources	Aspects of employee agreements and/or benefits plans.
Peter Prucnel	First Vice President & Senior Manager, Employee Relations/HR Policy and Compliance	Aspects of employee agreements and/or benefits plans.
Deveri Ray	First Vice President & Senior Manager, Payroll, Corporate Human Resources	Aspects of employee agreements and/or benefits plans.
Michael Rapaport	Claimant	Proofs of claims in these proceedings.
William G. Reed, Jr.	BOD Member	BOD consideration and discussion of certain relevant issues.

Michael Reynoldson	Claimant	Proofs of claims in these proceedings.
John Robinson	Division Executive, Risk Management Solutions, Regulatory Relations, Compliance	Relevant banking and FDIC regulations.
Laura C. Rogers Rodrigues	Claimant	Proofs of claims in these proceedings.
Luis P. Rodrigues	Claimant	Proofs of claims in these proceedings.
Stephen J. Rotella	Claimant/BOD Member	Proofs of claims in these proceedings.
Elizabeth Saunders	HR Committee Member	Aspects of employee agreements and/or benefits plans and BOD consideration and discussion of certain relevant issues.
David Schneider	Claimant	Proofs of claims in these proceedings.
Janquelin Schrag	Claimant	Proofs of claims in these proceedings.
Patricia Schulte	Claimant	Proofs of claims in these proceedings.
Daniel Shanks	Claimant	Proofs of claims in these proceedings.
Chandan Sharma	Claimant	Proofs of claims in these proceedings.
Scott Shaw	Claimant	Proofs of claims in these proceedings.
Charlie Sledd	Associate General Counsel, HR & Banking Operations	Aspects of employee agreements and/or benefits plans.
Genevieve Smith	Claimant	Proofs of claims in these proceedings.
Orin Smith	BOD Member	BOD consideration and discussion of certain relevant issues.
Michael S. Solender	Counsel	BOD consideration and discussion of certain relevant issues.
Jacob E. Sorensen	Claimant	Proofs of claims in these proceedings.

Steven Kenneth Stearns	Claimant	Proofs of claims in these proceedings.
Steven F. Stein	Claimant	Proofs of claims in these proceedings.
Mitchell Stevens	Claimant	Proofs of claims in these proceedings.
James Stever	BOD Member, HR Committee Chair	BOD consideration and discussion of certain relevant issues.
Deena Stone	First Vice President & Manager, HR Policy and Compliance	Aspects of employee agreements and/or benefits plans.
Richard Strauch	Claimant	Proofs of claims in these proceedings.
Jane Suchan	Claimant	Proofs of claims in these proceedings.
Jose O. N. Tagunicar	Claimant	Proofs of claims in these proceedings.
Craig E. Tall	Claimant	Proofs of claims in these proceedings.
Andrew Tauber	Claimant	Proofs of claims in these proceedings.
Susan Taylor	BOD Secretary	Relevant BOD determinations and related discussions and communications.
Radha Thompson	Claimant	Proofs of claims in these proceedings.
Ann Tierney	Claimant	Proofs of claims in these proceedings.
David A. Tomlinson	Claimant	Proofs of claims in these proceedings.
Valuation/Financial Expert		Issues related to change in control and relevant banking and FDIC regulations.
Anthony F. Vuoto	Claimant	Proofs of claims in these proceedings.
Marie Waugh	Senior Vice President, Employee Relations	Aspects of employee agreements and/or benefits plans.
John Webber	Claimant	Proofs of claims in these proceedings.

Bruce Weber	Claimant	Proofs of claims in these proceedings.
Jeffrey P. Weinstein	Claimant	Proofs of claims in these proceedings.
Stephen E. Whittaker	Claimant	Proofs of claims in these proceedings.
Robert J. Williams, Jr.	Claimant	Proofs of claims in these proceedings.
John F. Woods	Claimant	Proofs of claims in these proceedings.
Willis Wood, Jr.	HR Committee Member	Aspects of employee agreements and/or benefits plans and BOD consideration and discussion of certain relevant issues.
Weijia Wu	Claimant	Proofs of claims in these proceedings.
Kathy H. Yeu,	Claimant	Proofs of claims in these proceedings.
Michael R. Zarro	Claimant	Proofs of claims in these proceedings.

Dated: March 18, 2013 Wilmington, Delaware

/s/ Amanda R. Steele

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- and -

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