UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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| In re | : |
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| 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 |
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| 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. |
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| 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. |
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| 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. |
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| 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. |
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| 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. |
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| 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. |
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| 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. |
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| 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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ATTORNEYS FOR WMI LIQUIDATING TRUST