

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re : **Chapter 11**
: **WASHINGTON MUTUAL, INC., et al.,¹** : **Case No. 08-12229 (MFW)**
: **(Jointly Administered)**
: **Debtors.** :
: **Re: Docket Nos. 11061, 11062, 11063,**
: **11136, 11191, 11241**
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**CERTIFICATION OF COUNSEL REGARDING AGREED ORDER SETTING
DEADLINES WITH RESPECT TO AMENDED
EMPLOYEE CLAIMS AND RELATED OBJECTIONS**

The undersigned certifies as follows:

1. In February and March, 2013, various claimants (the “Claimants”) filed motions to amend their proofs of claim [D.I. 11009, 11010, 11011, 11012, 11013, 11014, 11015, 11016, 11017, 11018, 11019, 11020, 11026, 11182 & 11183].

2. In March and May, 2013, the Court entered the *Order Granting the Motion of Chandan Sharma for Entry of an Order Authorizing Claimant To Amend his Respective Claim as More Fully Set Forth in the Motion* [D.I. 11063], the *Order Granting the Motions of John McMurray, Alfred Brooks, et al., for Entry of an Order Authorizing Claimants To Amend Their Respective Claims as More Fully Set Forth in the Motions* [D.I. 11062], the *Order Granting Motions of Sean Beckett, Anthony Bozzuti, et al.* [D.I. 11061], the *Order*

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.



Granting the Motion of John Murphy for Entry of an Order Authorizing Murphy To Amend his Proof of Claim as More Fully Set Forth in the Motion [D.I. 11136], and the *Order Granting the Motions of Henry J. Berens and Michael Zarro for Entry of an Order Authorizing Claimants To Amend Their Respective Claims as More Fully Set Forth in the Motion* [D.I. 11241] (collectively, the “Orders Granting Claimants Leave to Amend Proofs of Claim”).

3. On April 3, 2013, the Court entered the *Agreed Order Adjourning Hearing on WMI Liquidating Trust’s Motion to Amend Omnibus Objection and Suspending Amended Scheduling Order with Respect to Employee Claims Hearing and Adversary Proceedings* [D.I. 11191] (the “Agreed Order”) which, among other things, extended certain deadlines and tolling provisions included in the Orders Granting Claimants Leave to Amend Proofs of Claim.

4. Attached hereto as **Exhibit A** is an agreed proposed form of order further extending certain deadlines and tolling provisions included in the Agreed Order with respect to the Orders Granting Claimants Leave to Amend Proofs of Claim (the “Proposed Order”). WMILT has circulated the Proposed Order to counsel for the Claimants, and counsel for the Claimants have reviewed and commented to the Proposed Order and have indicated they have no objection to the submission of the Proposed Order for approval pursuant to this certification of counsel.

WHEREFORE WMILT respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: May 13, 2013
Wilmington, Delaware

/s/ Amanda R. Steele

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Attorneys for WMI Liquidating Trust

EXHIBIT A

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

	X	
	:	
<i>In re</i>	:	Chapter 11
	:	
WASHINGTON MUTUAL, INC., <u>et al.</u> , ¹	:	Case No. 08-12229 (MFW)
	:	(Jointly Administered)
	:	
Debtors.	:	Re: Docket Nos. 11061, 11062, 11063,
	:	11136, 11191, 11241 &
	:	
	X	

**AGREED ORDER SETTING DEADLINES WITH RESPECT TO AMENDED
EMPLOYEE CLAIMS AND RELATED OBJECTIONS**

Upon this Court’s entry of the *Agreed Order Adjourning Hearing on WMI Liquidating Trust’s Motion to Amend Omnibus Objection and Suspending Amended Scheduling Order with Respect to Employee Claims Hearing and Adversary Proceedings*, dated April 3, 2013 [D.I. 11191] (the “Agreed Order”); and the interested parties subject to the Agreed Order having approved a new schedule, as set forth herein, with respect to certain amended proofs of claims; and, after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED as follows:

1. All deadlines and tolling provisions included in the Orders Granting Claimants Leave to Amend Proofs of Claim, as defined in the Agreed Order, that had not expired as of March 25, 2013 shall be extended such that (a) WMILT may file objections to the amended proofs of claim and/or file additional adversary proceedings on, or before, July 12, 2013, and (b) Claimants, as defined in the Agreed Order, shall file responses, if any, to such objections on or

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before September 16, 2013, unless otherwise agreed to by the applicable parties or ordered by the Court. The deadlines to answer or otherwise respond to additional adversary proceedings filed by WMILT (if any) shall be governed by the Federal Rules of Bankruptcy Procedure.

2. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: May ____, 2013
Wilmington, Delaware

THE HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE