

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

WASHINGTON MUTUAL, INC., *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 08-12229 (MFW)

Re: Docket Nos. 12715 & 12719

Objection Deadline: At the hearing

Hearing Date: June 10, 2021 at 3:00 p.m. (ET)

NOTICE OF MOTIONS AND HEARING

PLEASE TAKE NOTICE that, on June 4, 2021, WMI Liquidating Trust (the “Trust”), as successor to Washington Mutual, Inc. (“WMI”) and WMI Investment Corp. (together with WMI, the “Reorganized Debtors,” and prior to the effective date of the Plan (as defined below), the “Debtors”), filed the *Emergency Motion of WMI Liquidating Trust to Reopen the Chapter 11 Case of Washington Mutual, Inc. for the Limited Purpose of (I) Enforcing the Exculpation, Injunction, Release and Discharge Provisions of the Debtors’ Joint Chapter 11 Plan and Confirmation Order and (II) Imposing Sanctions* [Docket No. 12715] (the “Motion to Reopen”) and the *Motion of WMI Liquidating Trust to (I) Enforce the Exculpation, Injunction, Release, and Discharge Provisions of the Debtors’ Joint Chapter 11 Plan and Confirmation Order and (II) Impose Sanctions* (the “Motion to Enforce,” and together with the Motion to Reopen, the “Motions”)² with the United States Bankruptcy Court for the District of Delaware (the “Court”).

You were previously served with a copy of the Motions.

PLEASE TAKE FURTHER NOTICE that, contemporaneously with the filing of the Motions, the Trust also filed a motion to shorten the notice and objection period with respect to

¹ The Reorganized 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 Reorganized Debtors had a former address of 1201 Third Avenue, Suite 3000, Seattle, Washington 98101.

² The Motion to Enforce was attached as Exhibit B to the Motion to Reopen.



the Motions [Docket No. 12716] (the “Motion to Shorten”). **You were previously served with a copy of the Motion to Shorten.**

PLEASE TAKE FURTHER NOTICE that, on June 7, 2021, the Court granted the relief requested in the Motion to Shorten [Docket No. 12719] (the “Order Shortening Notice”). **You are being served with a copy of the Order Shortening Notice contemporaneously herewith.**

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order Shortening Notice (i) a hearing to consider the Motions will be held on **June 10, 2021 at 3:00 p.m. (ET)** before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801, and (ii) responses or objections to the Motions, if any, may be raised with the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTIONS ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTIONS WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 7, 2021
Wilmington, Delaware

/s/ Marcos A. Ramos

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