

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

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*In re:* : **Chapter 11**  
: :  
WASHINGTON MUTUAL, INC., et al.,<sup>1</sup> : **Case No. 08-12229 (MFW)**  
: :  
: **(Jointly Administered)**  
**Debtors.** : :  
: :  
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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON MAY 20, 2009 AT 11:30 A.M. (EDT)**

**I. CONTINUED MATTER:**

1. Motion of Denise Cassese, George Rush and Richard Schroer for Relief from Automatic Stay to Continue Pre-Petition Class Action Against Washington Mutual, Inc. [Docket No. 857; Filed 4/2/09]

Objection Deadline: May 13, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received: None

Related Documents:

- i. Notice of Filing of Stipulation to Extend Time [Docket No. 1003; filed 5/12/09]

Status: The hearing on this matter is adjourned to the hearing scheduled for August 24, 2009.

**II. UNCONTESTED MATTER WITH CERTIFICATION OF NO OBJECTION:**

2. Application of Debtors Pursuant to Sections 327(e) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014 for Authorization to Employ and Retain Quinn Emanuel Urquhart Oliver & Hedges, LLP, as Special Litigation and Conflicts Counsel to the Debtors, Nunc Pro Tunc to April 3, 2009 [Docket No. 888; filed 4/8/09]

Objection Deadline: April 30, 2009 at 4:00 p.m. (EDT)

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<sup>1</sup> 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 Debtors' principal offices are located at 1301 Second Avenue, Seattle, Washington 98101.

Objections/Responses Received: None

Related Documents:

- i. Supplemental Declaration of Susheel Kirpalani in Further Support of the Application of Debtors Pursuant to Section 327(e) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014 for Authorization to Employ and Retain Quinn Emanuel Urquhart Oliver & Hedges, LLP, as Special Litigation and Conflicts Counsel to the Debtors, Nunc Pro Tunc to April 3, 2009 [Docket No. 969; filed 4/30/09]
- ii. Certification of No Objection Regarding Application of Debtors Pursuant to Sections 327(e) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014 for Authorization to Employ and Retain Quinn Emanuel Urquhart Oliver & Hedges, LLP, as Special Litigation and Conflicts Counsel to the Debtors, Nunc Pro Tunc to April 3, 2009 [Docket No. 1037; filed 5/18/09]

Status: On May 18, 2009, the Debtors filed a certification of no objection with respect to this matter. Accordingly, no hearing on this matter is necessary unless the Court has additional questions or concerns.

3. Debtors' Second Motion for Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending Exclusive Periods for the Filing of A Chapter 11 Plan and Solicitation of Acceptances Thereto [Docket No. 937; filed 4/22/09]

Objection Deadline: May 13, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received: None

Related Documents:

- i. Certification of No Objection Regarding Debtors' Second Motion for Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending Exclusive Periods for the Filing of A Chapter 11 Plan and Solicitation of Acceptances Thereto [Docket No. 1038; filed 5/18/09]

Status: On May 18, 2009, the Debtors filed a certification of no objection with respect to this matter. Accordingly, no hearing on this matter is necessary unless the Court has additional questions or concerns.

### **III. UNCONTESTED MATTER GOING FORWARD:**

4. Application of Debtors and Debtors-in-Possession Pursuant to Sections 327(e) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014 for Authorization to Employ Elliott Greenleaf as Delaware Special Litigation and Conflicts Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 940; filed 4/23/09]

Objection Deadline: April 30, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received: None

Related Documents: None.

Status: The hearing on this matter is going forward.

**IV. CONTESTED MATTERS GOING FORWARD:**

5. Motion of Washington Mutual, Inc. for an Order Pursuant to Sections 105(a) and 363 of the Bankruptcy Code Authorizing But Not Directing (I) Washington Mutual, Inc. to Exercise Its Ownership Rights Over Certain Insurance Policies, (II) The Distribution of the Policy Proceeds, and (III) The Termination of a Revocable Grantor Trust of Washington Mutual, Inc. [Docket No. 908; filed 4/16/09]

Objection Deadline: May 5, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received:

- A. JPMorgan Chase Bank, National Association's Response to Motion of Washington Mutual, Inc. for an Order Pursuant to Sections 105(a) and 363 of the Bankruptcy Code Authorizing But Not Directing (I) Washington Mutual, Inc. to Exercise Its Ownership Rights Over Certain Insurance Policies, (II) the Distribution of the Policy Proceeds, and (III) the Termination of a Revocable Grantor Trust of Washington Mutual, Inc. [Docket No. 982; filed 5/5/09]

Related Documents: None.

Status: The hearing on this matter is going forward.

6. Motion of MSG Media for Relief from the Automatic Stay to Terminate the Naming Rights and Sponsorship Agreement [Docket No. 983; filed 5/15/09]

Objection Deadline: May 15, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received:

- A. Debtors' Reservation of Rights with Respect to Motion of MSG Media for Relief from the Automatic Stay to Terminate the Naming Rights and Sponsorship Agreement [Docket No. 1024; filed 5/15/09]

Related Documents: None.

Status: The hearing on this matter is going forward.

7. Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. [Docket No. 974; filed 5/1/09]

Objection Deadline: May 13, 2009 at 4:00 p.m. (EDT)

Objections/Responses Received:

- A. JPMorgan Chase Bank, National Association's Objection and Response to Debtors' Motions for (A) an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase, N.A.; and (B) an Order Pursuant to 11 U.S.C. § 105(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. [Docket No. 1017; filed 5/13/09]
- B. Debtors' Reply to Objection of JPMorgan Chase Bank, N.A. to Debtor's Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. [Docket No. 1036; filed 5/18/09]

Related Documents:

- i. Order Approving Stipulation Between the Debtors, Washington Mutual, Inc. and WMI Investment Corp., and JPMorgan Chase Bank, N.A. to Extend Time for Filing of Reply to Objection to Debtors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. [Docket No. 1031; filed 5/15/09]

Status: The hearing on this matter is going forward.

**V. ADVERSARY PRE-TRIAL CONFERENCE:**

8. Complaint filed by JPMorgan Chase Bank, National Association [Adversary Proceeding No. 09-50551; Docket No. 1; filed 3/24/09]
  - A. Summons and Notice of Pretrial Conference [Docket No. 4; filed 3/25/09]
  - B. Order Approving Stipulation Between Plaintiff and Defendants Washington Mutual, Inc. and WMI Investment Corp. Extending Time to Respond to Complaint [Docket No. 8; filed 4/23/09]
  - C. Motion to Extend Time for Assert Counterclaims Against JPMorgan Chase Bank, N.A. [Docket No. 10; filed 5/1/09]
  - D. Order Approving Stipulation Between Plaintiff and Additional Defendant Federal Deposit Insurance Corporation [Docket No. 11; filed 5/1/09]

- E. Objection and Response of Debtors' Motion for (A) an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase, N.A. and (B) an Order Pursuant to 11 U.S.C. Section 105(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. [Docket No. 13; filed 5/13/09]
- F. Reply of Debtor to Objection of JPMorgan Chase Bank, NA. to Debtor's Motion for an Order (A) Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A.; and (B) Pursuant to 11 U.S.C. § 503(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. [Docket No. 15; filed 5/18/09]

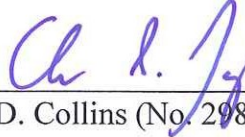
Status: The pretrial conference is going forward. All parties will seek to address the Court, including with respect to proposed discovery scheduling.

- 9. Complaint for Turnover of Estate Property filed by Washington Mutual, Inc., WMI Investment Corp. against JPMorgan Chase Bank, N.A. [Adversary Proceeding No. 09-50934; Docket No. 1; filed 4/27/09]
  - A. Motion to Intervene filed by the Official Committee of Unsecured Creditors [Docket No. 3; filed 4/29/09]
  - B. Memorandum of Law in Support of the Motion for Intervention of the Official Committee of Unsecured Creditors of Washington Mutual, Inc. and WMI Investment Corp. [Docket No. 4; filed 4/29/09]
  - C. Summons and Notice of Pretrial Conference [Docket No. 5; filed 4/30/09]
  - D. Alternate Dispute Resolution [Docket No. 6; filed 4/30/09]
  - E. Response to Motion for Intervention of the Official Committee of Unsecured Creditors of Washington Mutual, Inc. and WMI Investment Corp.. [Docket No. 7; filed 5/13/09]
  - F. Motion to Dismiss Adversary Proceeding filed by JPMorgan Chase Bank, N.A. [Docket No. 8; filed 5/13/09]
  - G. Opening Brief in Support of Motion to Dismiss Adversary Proceeding [Docket No. 9; filed 5/13/09]
  - H. Appendix re Opening Brief in Support of Motion to Dismiss Adversary Proceeding [Docket No. 10; filed 5/13/09]
  - I. Reply Brief in Support of the Motion for Intervention of the Official Committee of Unsecured Creditors of Washington Mutual, Inc. and WMI Investment Corp. [Docket No. 12; filed 5/15/09]

Status: Briefing with respect to this matter is complete. The Movant requests that it be permitted to address the Court regarding this matter at the status conference scheduled for May 20, 2009.

Dated: May 18, 2009  
Wilmington, Delaware

Respectfully submitted,



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