IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

X	
:	Chapter 11
:	Case No. 08-12229 (MFW)
:	
:	Jointly Administered
:	Re: Dockets No. 974 & 1017
	x : : : : : : : : : : : : : : : : : : :

CERTIFICATION OF COUNSEL SEEKING ENTRY OF 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.

- I, Neil R. Lapinski, proposed Delaware special litigation and conflict counsel to Washington Mutual, Inc. and WMI Investment Corp. (collectively, the "Debtors"), hereby certify the following:
- 1. On May 1, 2009, the Debtors filed a Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank, N.A. ("JPMC")(Docket No. 974).
- 2. On May 13, 2009, JPMC filed an 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 Bank, N.A. (Docket No. 974); and (B) an Order Pursuant to 11 U.S.C. § 105(a) and Federal Rules of Bankruptcy Procedure 7013 and 9006(b) Enlarging the

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The Debtors in these chapter 11 cases (the "Chapter 11 Cases") and the last four digits of each Debtor's federal tax identification numbers are: (i) Washington Mutual, Inc. (3725) and (ii) WMI Investment Corp. (5395).

Time for Asserting Counterclaims Against JPMorgan Chase Bank, N.A. (Docket No. 10) (the "Objection")(Docket No. 1017).

- 3. Pursuant to Local Bankruptcy Rule 9006-1(d), the Debtors' reply is due by 4:00 p.m. on May 15, 2009.
- 4. On May 15, 2009, the Debtors and JPMC entered into that certain 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. (the "Stipulation") attached hereto as Exhibit A.
- 5. Pursuant to the Stipulation and consistent with Fed. R. Civ. Proc. 6(b), the Debtors and JPMC have agreed that good cause exists to enlarge and extend the time in which the Debtors must reply to the Objection until May 18, 2009 at 8:00 a.m.
- 6. The Debtors request that the Court enter the Proposed Order, attached hereto as Exhibit B, approving the Stipulation at its earliest convenience. Counsel is available at the request of the Court.

Dated: May 15, 2009

Wilmington, Delaware

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