

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

	X	
<i>In re</i>	:	Chapter 11
	:	
WASHINGTON MUTUAL, INC. <i>et al.</i> ,	:	Case No. 08-12229 (MFW)
	:	
Debtors.	:	Jointly Administered
	X	
Black Horse Capital LP <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Adversary Proceeding
	:	No. 10-51387 (MFW)
v.	:	
	:	
JPMorgan Chase Bank, N.A. <i>et al.</i> ,	:	Ref. Nos. 105, 106, 108, 109, 110, 118,
	:	139, 149
Defendants.	:	
	X	

**JOINT NOTICE OF COMPLETION OF BRIEFING ON MOTIONS OF  
DEFENDANTS JPMORGAN CHASE BANK, N.A. AND  
WASHINGTON MUTUAL, INC. FOR PARTIAL SUMMARY JUDGMENT**

*PLEASE TAKE NOTICE that briefing on the Motion of Defendant JPMorgan Chase Bank, N.A., For Partial Summary Judgment (the “JPMC Motion”) filed in the above-captioned adversary proceeding on November 2, 2010 [Docket No. 105], and the Motion of Defendant Washington Mutual, Inc. for Summary Judgment, (the “WMI Motion,” and together with the JPMC Motion, the “Motions”) filed on November 2, 2010 [Docket No. 109] is complete. Defendants JPMorgan Chase Bank, N.A., and Washington Mutual, Inc. hereby advise the Court that the following pleadings are relevant to the Motions:*

1. *Motion of Defendant JPMorgan Chase Bank, N.A., For Partial Summary Judgment, filed November 2, 2010 [Docket No. 105].*

2. *Memorandum of Points and Authorities in Support of Defendant JPMorgan Chase Bank, N.A.'s, Motion For Partial Summary Judgment, filed November 2, 2010 [Docket No. 106].*

3. *Declaration of Brent J. McIntosh in Support of Defendant JPMorgan Chase Bank, N.A.'s, Motion For Partial Summary Judgment, filed on November 2, 2010 [Docket No. 108].*

4. *Motion of Defendant Washington Mutual, Inc. for Summary Judgment, filed November 2, 2010 [Docket No. 109].*

5. *Opening Brief of Washington Mutual, Inc. in Support of Motion for Summary Judgment, filed November 2, 2010 [Docket No. 110].*

6. *Joinder of the Official Committee of Unsecured Creditors of Washington Mutual, Inc., et al., in Motion of Defendant Washington Mutual, Inc. for Summary Judgment, filed November 4, 2010 [Docket No. 118].*

7. *Memorandum of Law in Support of Cross-Motion for Partial Summary Judgment and Opposition to Defendants' Motions for Partial Summary Judgment [Docket No. 139] (the "Plaintiffs' Memorandum of Law"), filed by Plaintiffs on November 17, 2010. The exhibits to the Memorandum of Law include:*

- a. *Declaration of Jack F. Williams*
- b. *Declaration of Hal S. Scott*
- c. *Affidavit of Jeremy B. Coffey in Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and Omnibus Opposition to Defendants' Motions for Partial Summary Judgment*
- d. *Plaintiffs' Cross-Motion for Partial Summary Judgment and Omnibus Opposition to Defendants' Motions for Partial Summary Judgment*

8. *Defendants' Joint Reply In Support Of Their Motions For Summary Judgment and Opposition to Plaintiffs' Cross-Motion For Summary Judgment*, filed November 22, 2010 [Docket No. 149].

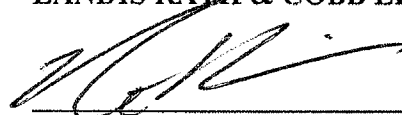
9. *Declaration in Support of Defendants' Joint Reply in Support of Their Motions for Summary Judgment and Opposition to Plaintiffs' Cross-Motion for Summary Judgment*, filed November 22, 2010 [Docket No. 150].

Dated: November 22, 2010  
Wilmington, Delaware

Respectfully submitted,

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