

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

In re

WASHINGTON MUTUAL, INC., *et al.*,¹

Debtors

Chapter 11

Case No. 08-12229 (MFW)

Jointly Administered

Ref. Docket Nos. 974, 1017, 1036, 1219, 1220

**MOTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION FOR
RECONSIDERATION OF OPINION AND ORDER GRANTING DEBTORS' MOTION
FOR RULE 2004 DISCOVERY**

JPMorgan Chase Bank, National Association ("JPMC"), by and through its undersigned counsel, submits this Motion for Reconsideration of Opinion and Order Granting Debtors' Motion for Rule 2004 Discovery (the "Motion"). In support hereof, JPMC respectfully states as follows:

On May 1, 2009, the Debtors filed their Motion for Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004.1 Directing the Examination of JPMorgan Chase Bank N.A. [Docket No. 974] (the "Rule 2004 Motion").

On May 13, 2009, JPMC filed its objection to the 2004 Motion [D.I. 1017].

On May 18, 2009, the Debtors filed their reply to the JPMC Rule 2004 Objection [D.I. 1036].

The Court heard argument in connection with the Rule 2004 Motion on May 20, 2009.

¹ Debtors in these chapter 11 cases and the last four digits of each Debtor's federal tax identification numbers are: (a) Washington Mutual, Inc. (3725); and (b) WMI Investment Corp. (5395). Debtors continue to share their principal offices with the employees of JPMorgan Chase located at 1301 Second Avenue, Seattle, Washington 98101.

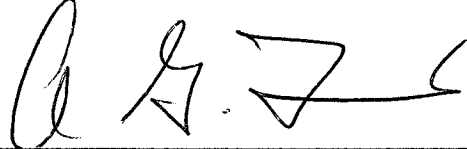
On June 24, 2009, the Court granted the Rule 2004 Motion, entering its opinion as Docket No. 1219 (the “Rule 2004 Opinion”) and order as Docket No 1220 (the “Rule 2004 Order”). The Rule 2004 Opinion constitutes findings of facts and conclusions of law of the Court pursuant to Fed. R. Bankr. P. 7052, made applicable to contested matters pursuant to Fed. R. Bankr. P. 9014.

For the reasons set forth in the Brief of JPMorgan Chase Bank, N.A. in Support of Motion for Reconsideration of Opinion and Order Granting Debtors’ Motion for Rule 2004 Discovery filed contemporaneously herewith, JPMC requests that the Court reconsider the Rule 2004 Opinion and Rule 2004 Order, and enter an order in the form annexed hereto as Exhibit A denying the Rule 2004 Motion.

WHEREFORE, JPMC respectfully requests that the Court (a) grant reconsideration of the Rule 2004 Opinion and the Rule 2004 Order; (b) deny the Rule 2004 Motion; and (c) grant such other and further relief as is just and proper.

Dated: June 26, 2009
Wilmington, Delaware

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*Counsel for JPMorgan Chase Bank,
National Association*

Exhibit A

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

In re

WASHINGTON MUTUAL, INC., *et al.*,¹

Debtors.

:
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: Chapter 11
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: Case No. 08-12229 (MFW)
:
: (Jointly Administered)
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: Ref. Doc. Nos. 974, 1017, 1036, 1219, 1220
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**ORDER GRANTING MOTION OF JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION FOR RECONSIDERATION OF OPINION AND ORDER
GRANTING DEBTORS' MOTION FOR RULE 2004 DISCOVERY**

Upon consideration of the Motion of JPMorgan Chase Bank, N.A. for Reconsideration of Opinion and Order Granting Debtors' Motion For Rule 2004 Discovery dated June 26, 2009 (the "Motion to Reconsider") and the Brief of JPMorgan Chase Bank, N.A. in support of the Motion to Reconsider; and upon consideration of any responses thereto; and good cause appearing therefor; it is hereby

ORDERED, that the Motion for Reconsideration is GRANTED; and it is further

ORDERED, that the Rule 2004 Motion² is DENIED.

Dated: July ___, 2009
Wilmington, Delaware

The Honorable Mary F. Walrath
United States Bankruptcy Judge

¹ Debtors in these Chapter 11 cases and the last four digits of each Debtor's federal tax identification numbers are: (a) Washington Mutual, Inc. (3725); and (b) WMI Investment Corp. (5395). Debtors continue to share their principal offices with the employees of JPMorgan Chase located at 1301 Second Avenue, Seattle, Washington 98101.

² As defined in the Motion to Reconsider.

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

In re:

WASHINGTON MUTUAL, INC., et al.,

Debtors.

Chapter 11

Case No. 08-12229 (MFW)
(Jointly Administered)

Ref. Docket Nos. 974, 1017, 1036, 1219, 1220

Hearing Date: July 27, 2009 at 10:30 a.m. (ET)
Objections Due: July 15, 2009 at 4:00 p.m. (ET)

NOTICE OF MOTION

TO: Counsel to the Debtors, Counsel to the Official Committee of Unsecured Creditors, The United States Trustee for the District of Delaware, and all parties requesting notice under Bankruptcy Rule 2002.

JPMorgan Chase Bank, National Association ("JPMC"), by and through the undersigned counsel, has filed the attached **Motion of JPMorgan Chase Bank, National Association for Reconsideration of Opinion and Order Granting Debtors' Motion for Rule 2004 Discovery** (the "Motion") and **Brief of JPMorgan Chase Bank, National Association in Support of Motion for Reconsideration of Opinion and Order Granting Debtors' Motion for Rule 2004 Discovery**.

Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **July 15, 2009 at 4:00 p.m. (ET)**.

At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be **received no later than 4:00 p.m. (ET) on July 15, 2009**.

A HEARING ON THE MOTION, IF NECESSARY, WILL BE HELD ON **JULY 27, 2009 AT 10:30 A.M. (ET)** BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: Wilmington, Delaware
June 26, 2009

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