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To Whom it May Concern:

I have known and worked with Peter Downey of Schrieffer & Downey, LLP over the past several years. Mr. Downey and his firm have represented Washington Mutual in numerous complex litigation matters.

Mr. Downey is very talented. His competence, professionalism and willingness to go the extra mile for his clients has been appreciated. Mr. Downey has obtained outstanding results on behalf of Washington Mutual in litigation matters. He is professional, aggressive and obtains results in the most cost-effective manner. For example, Mr. Downey has had litigation matters on our behalf dismissed in the early stages of the litigation process (and before conducting costly Discovery) in exchange for a waiver of costs. We are glad that he is "on our team".

I assign cases to Schrieffer & Downey, LLP because of attorneys like Peter Downey. I can be contacted at the telephone number above and I would be happy to speak with you further if you have any questions.

Cordially,

A handwritten signature in cursive script that reads 'Yolanda Peña'.

Yolanda Peña
Washington Mutual
Litigation Administrator