

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	Chapter 11
)	
CORUS BANKSHARES, INC. ¹)	Case No. 10-26881 (PSH)
)	
Debtor.)	
)	

**ORDER ESTABLISHING CERTAIN NOTICE, CASE
MANAGEMENT, AND ADMINISTRATIVE PROCEDURES**

Upon the motion, dated June 15, 2010 (the “Motion”)², of Corus Bankshares, Inc., as debtor and debtor in possession (the “Debtor”), for the entry of an order (the “Order”) establishing certain notice, case management, and administrative procedures; and upon the Declaration of Randy P. Curtis in Support of First Day Pleadings; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor’s estate, its creditors and other parties in interest; and the Debtor having provided appropriate notice under the circumstances of the Motion and the opportunity for a hearing on the Motion, and that no other or further notice is required; and the Court having reviewed the Motion and having heard the statements in support of the relief

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is: Corus Bankshares, Inc. (3592). The location of the Debtor’s corporate headquarters and the service address for the Debtor is: 10 S. Riverside Plaza, Suite 1800, Chicago, IL 60606.

² All capitalized terms used but otherwise not defined herein shall have the meaning set forth in the Motion.

requested therein at a hearing before the Court (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The notice, case management, and administrative procedures attached hereto as Exhibit 1 (the “Case Management Procedures”) are approved and shall govern all applicable aspects of this chapter 11 case.
3. The Debtor’s notice, claims, and balloting agent, BMC Group, Inc. (“BMC”), is authorized to establish a case website available at <http://bmcgroup.com/corus>, where, among other things, electronic copies of all pleadings filed in the Debtor’s chapter 11 case shall be posted within three (3) business days of filing and may be viewed free of charge.
4. Any notice sent by the Debtor or any other party in interest shall be deemed to comply with the requirements set forth in section 342(c)(1) of the Bankruptcy Code so long as either (a) the notice is accompanied by a document, substantially in the form attached hereto as Exhibit 2, containing the name, address, and last four digits of the taxpayer identification number of the Debtor, or (b) the notice includes a footnote containing this information.
5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Court’s local rules are satisfied by such notice.
6. The Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

8. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

9. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2010
Chicago, Illinois

United States Bankruptcy Judge

EXHIBIT 1

Case Management Procedures

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)		
In re:)		Chapter 11
)		
CORUS BANKSHARES, INC. ¹)		Case No. 10-26881 (PSH)
)		
Debtor.)		
)		

NOTICE, CASE MANAGEMENT, AND ADMINISTRATIVE PROCEDURES

These notice, case management, and administrative procedures (the “Case Management Procedures”) have been approved by the United States Bankruptcy Court for the Northern District of Illinois (the “Court”) for the chapter 11 case of the above-captioned debtor (the “Debtor”) pursuant to the *Motion for Entry of an Order Establishing Certain Notice, Case Management, and Administration Procedures* (the “Motion”).

On _____, 2010, the Court entered an order (the “Order”) approving the Case Management Procedures. Anyone may obtain a copy of the Order, as well as any document filed with the Court in this chapter 11 case, by (a) accessing the website maintained by the Debtor’s notice, claims, and balloting agent, BMC Group, Inc. (“BMC”), at <http://bmcgroup.com/corus> (the “Case Website”); (b) contacting BMC directly at BMC Group Inc., Attn: Corus Bankshares, 18750 Lake Drive East, Chanhassen, Minnesota 55317, telephone 800-909-0100; or (c) accessing PACER on the Court’s website at <https://ecf.ilnb.uscourts.gov> for a fee. Finally,

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paper copies of all pleadings filed in the Debtor's chapter 11 case may be available from the clerk of the Court.

D. Omnibus Hearing Dates

1. All Matters to be Heard at Omnibus Hearings. The Court will schedule periodic omnibus hearings to consider all motions, pleadings, applications, objections and responses thereto, and other requests for relief (the "Omnibus Hearings").

2. Setting Omnibus Hearings.

a. Ordinary Scheduling Procedures. Notwithstanding Rule 9013-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Illinois (the "Local Bankruptcy Rules"), parties may only schedule motions and other pleadings for hearing at an Omnibus Hearing scheduled to occur at least 14 calendar days after service of the motion or application (or at least 17 calendar days if service by U.S. mail) (the "Ordinary Scheduling Procedures").

b. Emergency Scheduling Procedures. Notwithstanding the Ordinary Scheduling Procedures, any party may request an emergency hearing pursuant to the Local Bankruptcy Rules.

c. Initial Omnibus Hearings. The first three Omnibus Hearings shall be held on the following dates and times:

i. ___:___ a.m./p.m. on the ___ day of _____,

ii. ___:___ a.m./p.m. on the ___ day of _____,

iii. ___:___ a.m./p.m. on the ___ day of _____,

3. Subsequent Omnibus Hearings. At or before the first Omnibus Hearing, the Debtor shall request the Court schedule additional Omnibus Hearings. The Court shall schedule such Omnibus Hearings and, upon scheduling, BMC shall post the date of the Omnibus Hearing

on the Case Website. Entities may contact BMC for information concerning all scheduled Omnibus Hearings.

4. Proposed Omnibus Hearing Agenda. The Debtor shall prepare Omnibus Hearing agendas in accordance with the following:

- a. On the date that is two (2) business days prior to each Omnibus Hearing, the Debtor's counsel shall file a proposed agenda with regard to the matters that are scheduled to be heard on such Omnibus Hearing (the "Proposed Hearing Agenda"). The Proposed Hearing Agenda is for the convenience of the Court and counsel and is not determinative of the matters to be heard on that day or whether there will be a settlement or a continuance.
- b. The Proposed Hearing Agenda will include, to the extent known by the Debtor's counsel: (i) the docket number and title of each pleading relating to a matter to be scheduled for hearing on such Omnibus Hearing, including the initial filing and any responses, replies or documents related thereto; (ii) notice of whether the matters are contested or uncontested; (iii) notice of whether the matters have settled or are proposed to be continued; (iv) other comments that will assist the Court; and (v) a suggested order in which the matters should be addressed.

E. Filing and Notice Procedures; Deadlines for the Filing of Responsive Pleadings

5. Procedures Established for Notices. All notices, motions, applications and other requests for relief, all briefs, memoranda, affidavits, declarations, and other documents filed in support of such papers seeking relief (collectively, the "Requests for Relief") and all objections and responses to such Requests for Relief (collectively, the "Objections," and together with the Requests for Relief and all other filed documents, the "Court Filings") shall be filed with the Court or other applicable court and served in accordance with the notice procedures set forth herein (the "Notice Procedures"). Except to the extent that such rules conflict with or are inconsistent with the Notice Procedures, the Bankruptcy Rules and the Local Bankruptcy Rules shall govern all matters in this Chapter 11 Case.

6. Entities Entitled to Notice. All Court Filings shall be electronically served on the Master Service List, the 2002 List, and Affected Entities (each as defined herein and collectively, the “Service Lists”) according to the notice procedures described herein.

a. Master Service List. BMC shall maintain a master service list (the “Master Service List”), which shall be updated every two weeks during the first 60 days of the case and at least every 30 days thereafter. Any updates to the Master Service List will be available: (a) on the Case Website; (b) from BMC; or (c) from the Debtor’s counsel. The Master Service List shall include:

- i. The Office of the United States Trustee for the Northern District of Illinois;
- ii. the Debtor and its counsel;
- iii. the members of and counsel to any statutory committee, and, until such appointment of an official creditors’ committee, the entities listed on the Consolidated List of Creditors Holding the 20 Largest Unsecured Claims filed pursuant to Bankruptcy Rule 1007(d);
- iv. counsel to the indenture trustee for each of the Debtor’s subordinated debentures;
- v. the Internal Revenue Service;
- vi. the Securities and Exchange Commission;
and
- vii. the Federal Deposit Insurance Corporation.

b. 2002 List: This group shall be comprised of all entities that have filed a request for service of filings pursuant to Bankruptcy Rule 2002 and Local Rule 2002-2 (the “2002 List”). BMC shall be responsible for maintaining an updated list of those who have submitted a proper 2002 Notice Request. Updates to the 2002 List will be available on the Case Website. A party will be included in the 2002 List only if:

- i. Email Address Required for Filing Requests: Notwithstanding Local Rule 2002-2(B), a request for service of papers

pursuant to Bankruptcy Rules 2002 and Local Rule 2002-2 (each, a “2002 Notice Request”) filed with the Court shall be deemed proper *if and only if* it includes the following information with request to the party filing such request: (a) name; (b) street address; (c) name of client(s), if applicable; (d) telephone number; (e) facsimile number; and (f) electronic mail (or “e-mail”) address.

- ii. Certification Opting Out of E-mail Service: Any individual or entity filing a 2002 Notice Request who does not maintain (and cannot practicably obtain) an e-mail address and therefore cannot receive service by e-mail must include in the 2002 Notice Request a certification to that effect (the “Certification”). The Certification shall include a statement certifying that the individual or entity (a) does not maintain an e-mail address, and (b) cannot practicably obtain an e-mail address at which the individual or entity could receive service by e-mail. Parties opting to file a Certification shall receive paper service via U.S. mail or private mail services.
- iii. Updating information of individual or entity on 2002 List: It is the responsibility of each entity submitting a 2002 Notice Request to file with the Court an updated 2002 Notice Request as necessary to reflect changes to any information, including e-mail address and contact person, and serve a copy of such request upon the Debtor and BMC.

- c. Affected Entities: This group shall be comprised of all entities with a particularized interest in the subject matter of the particular court filing (each, an “Affected Entity”).

7. At least every two weeks during the first 60 days of the Debtor’s chapter 11 case, and thereafter at least every 30 days, BMC shall maintain and update the 2002 List by:
(a) making any additions and deletions; (b) filing the updated 2002 List with the Court and

BMC; (c) serving the updated 2002 List on the parties listed thereon; (d) filing a certificate of service; and (e) simultaneously with the filing of the 2002 List, posting an updated version of the 2002 List on the Case Website.

8. Recipients of Service. With respect to Requests for Relief for which particular notices are required to be served on all creditors and parties in interest, including Bankruptcy Rules 2002(a)(2) and (3), 4001, 6004, 6007, and 9019, parties shall serve a Notice of Motion (as defined herein) only on the Master Service List by electronic mail or otherwise (if an exemption is granted) and in accordance with the following Notice Procedures, unless otherwise ordered by the Court:

- a. in the case of motions relating to the use, sale, lease, or abandonment of property, on each entity asserting an interest in that property;
- b. in the case of a motion for relief or modification of the automatic stay, on each entity asserting a lien or encumbrance on the affected property;
- c. in the case of a motion relating to the use of cash collateral or obtaining credit, each party asserting an interest in the cash collateral or a lien or other interest in property upon which a lien or encumbrance is proposed to be granted;
- d. in the case of a motion under Bankruptcy Rule 9019, all parties that are parties to the relevant compromise and settlement or that may be directly affected by such compromise or settlement;
- e. in the case of assumption, assignment, or rejection of an executory contract or an unexpired lease, each party to the executory contract or the unexpired lease;
- f. any objection, opposition, response, reply, or further document filed directly in response to a document shall be served on the entity who filed such document; and
- g. all matters for which the Bankruptcy Rules specifically require notice to all parties in interest shall be served on the

Master Service List and the 2002 List unless otherwise directed by the Court.

9. Except as set forth herein or otherwise provided by order of the Court, the Notice Procedures shall not apply to notices of the matters or proceedings described in the following Bankruptcy Rules:

- a. Bankruptcy Rule 2002(a)(1) (meeting of creditors pursuant to section 341 of the Bankruptcy Code);
- b. Bankruptcy Rule 2002(a)(2) (any proposed use, sale, or lease of property of the estate other than in the ordinary course of business, to the extent that such use, sale, or lease concerns all or substantially all of the Debtor's assets);
- c. Bankruptcy Rule 2002(a)(4) (hearing on the dismissal of a case or cases or the conversion of a case to another chapter);
- d. Bankruptcy Rule 2002(a)(5) (time fixed to accept or reject a proposed modification of a chapter 11 plan);
- e. Bankruptcy Rule 2002(a)(7) (time fixed for filing a proof of claim pursuant to Bankruptcy Rule 3003(c));
- f. Bankruptcy Rule 2002(b)(1) (time fixed for filing objections and any hearing to consider approval of a disclosure statement);
- g. Bankruptcy Rule 2002(b)(2) (time fixed for filing objections and any hearing to consider confirmation of a chapter 11 plan);
- h. Bankruptcy Rule 2002(d) (certain matters for which notice is to be provided to equity security holders);
- i. Bankruptcy Rule 2002(f)(1) (entry of an order for relief);
- j. Bankruptcy Rule 2002(f)(2) (dismissal or conversion of a case to another chapter of the Bankruptcy Code);
- k. Bankruptcy Rule 2002(f)(3) (time allowed for filing claims pursuant to Bankruptcy Rule 3002);
- l. Bankruptcy Rule 2002(f)(6) (waiver, denial, or revocation of a discharge as provided in Bankruptcy Rule 4006);

- m. Bankruptcy Rule 2002(f)(7) (entry of an order confirming a chapter 11 plan); and
- n. Bankruptcy Rule 2002(f)(8) (summary of the trustee's final report should this chapter 11 case be converted to a case under chapter 7 of the Bankruptcy Code).

10. Service of Notice of Motion. Notice of a Request for Relief will be considered adequate under the Notice Procedures only if the entity filing a Request for Relief includes a notice of motion with its Request for Relief (the "Notice of Motion"). Each Notice of Motion shall conspicuously state: (i) the title of the Request for Relief; (ii) the time and date of any deadline to object thereto (which deadline shall be in accordance with the Notice Procedures), (iii) the Omnibus Hearing (or other hearing as ordered by the Court) for which the Request for Relief is set to be considered by the Court (the "Applicable Hearing"); (iv) a copy of the Request for Relief itself; and (v) a statement that the relief requested in the Request for Relief may be granted by the Court without a hearing if not Response thereto is timely filed and served in accordance with these Case Management Procedures. Notwithstanding Local Rule 9013-3, electronic service of a Notice of Motion, except as provided herein, shall be sufficient notice of the Request for Relief so long as it is sent fourteen (14) calendar days before the Applicable Hearing, provided, however, that if the Notice of Motion is served by U.S. mail, the Request for Relief shall not be considered by the Court unless the Notice of Motion is filed and served in accordance with the Case Management Procedures at least seventeen (17) calendar days prior to the applicable hearing, unless otherwise ordered by the Court.

11. Certificates of Service. Consistent with Local Rule 9013-3(D) certificates of service of all Court Filings, including a Service List, shall be filed with the Court; provided that parties shall not be required to include the Service List when serving the certificate of service to such recipients.

12. Service of Adversary Proceedings. All pleadings and other Court filings in any adversary proceeding commenced in this chapter 11 case shall be served upon the Master Service List, each Affected Entity, and any other entities required to be served under any applicable Bankruptcy Rule or Local Rule.

13. Service of Orders. Consistent with Local Rule 9013-7, any party submitting an order shall serve a conformed copy of any entered order on (i) each Affected Entity, (ii) BMC, and (iii) the Debtor (collectively, the “Order Parties”) within two (2) business days of entry of the order. If the Court enters the draft order appended to the motion without modification, and the draft order has been previously served on the Order Parties, the order need not be re-served unless the Court directs otherwise. BMC shall also post all orders on the Case Website.

14. Filing and Service of Objections, Replies and Other Responsive Pleadings.

- d. Deadline for Objections. The deadline to file objections to motions, applications, or other requests for relief (the “Objection Deadline”) shall be 4:00 p.m. (prevailing Central Time) on the seventh calendar day before the Applicable Hearing, or (ii) as otherwise ordered by the Court. For emergency motions or applications the hearing on which is set on an expedited basis and fewer than fourteen (14) days after the motion or application is filed, the Objection Deadline shall be 12:00 p.m. noon (prevailing Central Time) one business day preceding the hearing date. Failure to file objections by the Objection Deadline may cause the Court to not consider the objection.
- e. Extension of Objection Deadline. The Objection Deadline may be extended with the consent of the entity filing the motion or application to a date that is no later than three (3) days before the Applicable Hearing.
- f. Service of Objections. All objections shall be filed with the Court and electronically served, except as otherwise provided herein, by the applicable Objection Deadline upon the entity filing the motion or application, those entities on the Master Service List, and each Affected Entity, with such Affected Entities to be determined based on the particular Court Filing being served.

- g. Service of Replies to Objections. If a Court Filing is a reply to an objection, such reply shall be filed with the Court and electronically served, except as otherwise provided herein, so as to actually be received by the Debtor, the parties filing objections and each Affected Entity, by 12:00 p.m. noon (prevailing Central Time) at least one (1) business day before the Applicable Hearing date.
- h. Filing of Certificates of Service. In accordance with Local Rule 9013-3(D), a certificate of service shall accompany all motions, applications or objections filed with the Court.

15. Granting the Request for Relief Without a Hearing.

- a. Provided that the notice filed with the Request for Relief includes a statement that the Request for Relief may be granted and an order entered without a hearing unless a timely Objection is made, after the Objection Deadline had passed and no Objection has been filed or served in accordance with the procedures set forth herein, counsel to the entity who has filed the Request for Relief may file a certification indicating that no Objection has been filed or served on the entity who has filed the Request for Relief (the "Certificate of No Objection").
- b. By filing a Certificate of No Objection, counsel for the movant will be representing to the Court that the movant is unaware of any objection to the Request for Relief and that counsel has reviewed the Court's docket and no Objection appears thereon.
- c. After a Certificate of No Objection has been filed, the Request for Relief may be heard at the next Omnibus Hearing if the Court does not grant the Request for Relief before such Omnibus Hearing. The Certificate of No Objection shall state the date after which the Court may grant the Request for Relief (the "Date of Presentment").
- d. Pursuant to Local Rule 9013-1, the Date of Presentment the entity chooses for its Notice of Motion shall be within 14 calendar days of the service of the Notice of Motion, except as otherwise provided in Local Rule 9013-1.
- e. Upon receipt of the Certificate of No Objection, the Court may grant the Request for Relief without further pleading, hearing or request, and, once an order granting such Request for Relief is entered, no further hearing on the Request for Relief shall be held.

16. Right to Request Special Notice Procedures. Nothing herein shall prejudice the right (a) of any entity to move the Court to further limit or expand notice of contested matters

and adversary proceedings upon a showing of good cause, including, without limitation, the right to file a motion seeking emergency *ex parte* relief or relief upon shortened notice, or (b) of any entity to request an enlargement or reduction of any time period under Bankruptcy Rule 9006(b) or (c).

17. Section 342 Notice Requirements. Any notice sent by the Debtor or any other party in interest shall be deemed to comply with the requirements set forth in section 342(c)(1) of the Bankruptcy Code so long as the notice is accompanied by an insert, substantially in the form attached hereto as Exhibit 2, containing the name, address, and last four digits of the taxpayer identification number of the Debtor in this case.

F. Service by Electronic Mail

18. Electronic Filing with the Court. All Court Filings shall be electronically served on the Court's electronic filing system (the "Electronic Filing System"), other than service of a summons and complaint in an adversary proceeding or documents filed under seal. Subject to the limited exclusions set forth herein, each party that has filed a notice of appearance and a request for service of papers shall be deemed to have consented to electronic service of papers and such service through the Electronic Filing System shall be deemed to constitute proper service for all parties who are sent such service.

19. Electronic Service. Because not all parties entitled to service will have entered a notice of appearance in this chapter 11 case, a party that serves a Court Filing via the Court's Electronic Filing System must also electronically serve the Rule 2002 Court Filing on the Master Service List and any Affected Parties pursuant to the Notice Procedures for service to be proper.

20. Opting-Out of Electronic Service. If an individual or entity has filed a Certification that it cannot receive electronic service and that individual or entity is on the Master Service List, the 2002 List or is an Affected Party, such party shall be served with paper copies

of any Court Filings by the party filing the motion or application. Such service shall be made using U.S. Mail or private mail services. BMC will also update the Case Website to include a copy of all Court Filings as is reasonably practicable.

21. Timing of Notice. Court Filings that are electronically served to any party, including service via the Electronic Filing System, shall be deemed timely served if sent according to the Notice Procedures described herein.

EXHIBIT 2

Notice of Debtor's Tax Identification Number

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	Chapter 11
)	
CORUS BANKSHARES, INC. ¹)	Case No. 10-26881 (PSH)
)	
Debtor.)	
)	

NOTICE OF DEBTOR’S TAX IDENTIFICATION NUMBER

PLEASE TAKE NOTICE that pursuant to the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* entered by the Bankruptcy Court on _____, 2010, the above-captioned debtor and debtor in possession hereby files, makes available, and gives notice of the following information:

	Debtor Name	Address	Last Four Digits of Taxpayer Identification Number.
1.	Corus Bankshares, Inc.	10 S. Riverside Plaza, Suite 1800 Chicago, Illinois 60606	3592

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