

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
CORUS BANKSHARES, INC., ) Case No. 10-26881  
)  
Reorganized Debtor. ) Honorable Pamela S. Hollis  
\_\_\_\_\_ )

**NOTICE OF AGREED MOTION FOR ENTRY  
OF STIPULATED PROTECTIVE ORDER**

**TO:** Attached Service List.

PLEASE TAKE NOTICE that on **Tuesday, February 14, 2012 at the hour of 10:00 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Pamela S. Hollis, or another judge sitting in her stead, at the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, located at 219 South Dearborn, Courtroom 644, Chicago, Illinois and then and there present the ***Agreed Motion for Entry of Stipulated Protective Order***, a copy of which is hereby served upon you.

Dated: February 9, 2012  
Chicago, Illinois

Respectfully submitted,

/s/ Alan P. Solow

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**CERTIFICATE OF SERVICE**

I, Oksana Koltko, an attorney, hereby certify that on the 9th day of February 2012, I caused a true and correct copy of the foregoing *Agreed Motion for Entry of Stipulated Protective Order* to be electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	
	)	Chapter 11
CORUS BANKSHARES, INC., <sup>1</sup>	)	Case No. 10-26881
	)	
Reorganized Debtor.	)	Honorable Pamela S. Hollis
	)	

**AGREED MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

Federal Deposit Insurance Corporation, as Receiver for Corus Bank, N.A., (the “FDIC-R”), by and through its undersigned counsel, hereby files this *Agreed Motion for Entry of Stipulated Protective Order* (the “Motion”) pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, made applicable to this proceeding through Rules 7026(c) and 9014 of the Federal Rules of Bankruptcy Procedure. Corus Bankshares, Inc. (“Bankshares”) has agreed to the terms of this Stipulated Protective Order (the “Protective Order”). In support of the Motion, the FDIC-R states the following:

1. The FDIC-R and Bankshares have agreed, through the Plan of Reorganization confirmed on September 27, 2011, that a hearing would be held to determine the priority of the FDIC-R’s claim to certain tax refunds.

2. In preparation for the hearing, the FDIC-R and Bankshares each served the other party with requests for the production of documents. Certain of the requests seek the production of documents that contain confidential and privileged information. The FDIC-R and Bankshares

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<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is: Corus Financial Corporation (3592). The location of the Reorganized Debtor’s corporate headquarters and the service address for the Reorganized Debtor is: 32 Broadway, Suite 1104, New York, NY 10004.



have agreed to treat such documents in the manner set forth in the Protective Order, which is attached hereto as Exhibit A.

WHEREFORE, for the foregoing reason, the FDIC-R respectfully requests that this Court approve the terms of the Protective Order and enter an order substantially in the form attached hereto as Exhibit A.

Dated: February 9, 2012  
Chicago, Illinois

Respectfully submitted,

/s/ Alan P. Solow

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