

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

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

**NOTICE OF REORGANIZED DEBTOR'S AGREED MOTION TO AMEND
DISCOVERY AND HEARING SCHEDULE**

TO: Attached Service List

PLEASE TAKE NOTICE that on Thursday, June 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 at 219 S. Dearborn Street, Chicago, Illinois 60604, and then and there present the Reorganized Debtor's Agreed Motion to Amend Discovery and Hearing Schedule, a copy of which is hereby served upon you.

Dated: June 8, 2012

Respectfully Submitted,
/s/ Micah E. Marcus

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Counsel to the Reorganized Debtor

¹ 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 Bankshares, Inc. (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.

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CORUS BANKSHARES, INC., ¹	)	Case No. 10-26881 (PSH)
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Reorganized Debtor.	)	Hon. Pamela S. Hollis
	)	
	)	

**REORGANIZED DEBTOR'S AGREED MOTION TO AMEND DISCOVERY AND
HEARING SCHEDULE**

The Reorganized Debtor, Corus Bankshares, Inc. ("Reorganized Debtor"), by and through its undersigned counsel, for its Motion to Amend Discovery and Hearing Schedule, states as follows:

1. On November 18, 2011, this Court entered an Order Establishing Schedule regarding the Priority Dispute (the "Original Scheduling Order").

2. Subsequent to the entry of the Original Scheduling Order, the Reorganized Debtor and the FDIC-R agreed to a modified discovery schedule. Since entry of that modified discovery schedule, counsel for the Reorganized Debtor and FDIC-R conferred and agreed to a second modified discovery schedule. After entry of the second modified discovery schedule, counsel for the Reorganized Debtor and FDIC-R conferred again and agreed to a third modified discovery and hearing schedule. The Reorganized Debtor and FDIC-R have agreed to revise one date in the third modified schedule—Disclosure of Non-Rebuttal Experts and Reports—from June 11 to

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June 25, 2012. This change will not affect any of the other dates in the third modified schedule.

3. Therefore, the Reorganized Debtor and the FDIC-R have agreed to the following modified schedule:

- a. Close of Fact Discovery: June 1, 2012
- b. Disclosure of Non-Rebuttal Experts and Reports: June 25, 2012
- c. Disclosure of Rebuttal Experts and Reports: July 11, 2012
- d. Supplemental Expert Reports: July 18, 2012
- e. Close of Expert Discovery: August 8, 2012
- f. Parties Exchange Exhibits: August 20, 2012
- g. Pre-Trial Briefs and Motions *in Limine*: August 30, 2012
- h. File Exhibits and Objections with Court: September 6, 2012
- i. Hearing: September 13, 2012 at 1:30 p.m. and September 14, 2012 at 10:00 a.m.

WHEREFORE, the Reorganized Debtor respectfully requests that the modified discovery and hearing schedule set forth above be approved.

Dated: June 8, 2012

Respectfully Submitted,
/s/ Micah E. Marcus

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CERTIFICATE OF SERVICE

I, Micah E. Marcus, an attorney, hereby certify that on the 8th day of June, 2012, I caused a true and correct copy of the foregoing ***Reorganized Debtor's Notice and Agreed Motion to Amend Discovery and Hearing Schedule*** 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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