

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

PROOF OF CLAIM

Name of Debtor:
The Cliffs at Walnut Cove Golf &
Country Club, LLC (9879)

Case Number:
12-01227

NOTE: See reverse and attached for List of Debtors/Case Numbers/important details. Other than claims under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for Administrative Expenses arising after the commencement of the case. A "request" for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503(a).

Name of Creditor (the person or other entity to whom the debtor owes money or property) :
Long, Parker, Warren, Anderson & Payne, P.A.

Name and address where notices should be sent:
29347868009776
Long, Parker Warren & Jones P A (formerly) now by change of name
PO Box 7216 Long, Parker, Warren,
Asheville, NC 28801 Anderson & Payne, P.A.

Creditor Telephone Number (828) 258-2296 email: fran@longparker.com

Name and address where payment should be sent (if different from above):

Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.

Check this box to indicate that this claim amends a previously filed claim.

Court Claim Number (if known):

Filed on:

RECEIVED

MAY 31 2012

BMC GROUP

If you have already filed a proof of claim with the Bankruptcy Court or BMC, you do not need to file again.

THIS SPACE IS FOR COURT USE ONLY

Payment Telephone Number () email:

1. AMOUNT OF CLAIM AS OF DATE CASE FILED \$ 1,365.00

If all or part of your claim is secured, complete item 4.

If all or part of your claim is entitled to priority, complete item 5.

Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.

2. BASIS FOR CLAIM: Claim for legal services rendered in connection with litigation
(See instruction #2)

3. LAST FOUR DIGITS OF ANY NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR:
9879

3a. Debtor may have scheduled account as:
Long, Parker, Warren & Jones, P.A.
(See instruction #3a)

3b. Uniform Claim Identifier (optional):
(See instruction #3b)

4. SECURED CLAIM: (See instruction #4)

Check the appropriate box if your claim is secured by a lien on property or a right of set off, attach required redacted documents, and provide the requested information.

Nature of property or right of setoff:
Describe:

Real Estate Motor Vehicle Other

Value of Property: \$

Annual Interest Rate: % Fixed or Variable
(when case was filed)

Amount of arrearage and other charges, as of time case filed, included in secured claim, if any: \$

Basis for Perfection:

Amount of Secured Claim: \$

Amount Unsecured: \$

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MAY 31 2012

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5. Amount of Claim Entitled to Administrative Expense status under 11 U.S.C. § 503(b)(9) or Priority under 11 U.S.C. § 507(a). If any part of the claim falls into one of the following categories, check the box specifying the administrative expense or priority and state the amount.

Amount entitled to priority: \$

Amount entitled to administrative expense under 11 U.S.C. § 503(b)(9): \$

You MUST specify the priority of the claim:

Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$11,725*), earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5).

Other - Specify applicable paragraph of 11 U.S.C. § 507(a) ().

Value of goods received by the debtor within 20 days before the date of the bankruptcy filing - 11 U.S.C. § 503(b)(9).

* Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

Cliffs POC



01117

6. CREDITS: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)

7. DOCUMENTS: *Attached are redacted copies of documents that support the claim*, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and definition of "redacted").
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.
 If the documents are not available, please explain:

DATE-STAMPED COPY: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.

The original of this completed proof of claim form must be sent by mail or hand delivered (FAXES OR EMAIL NOT ACCEPTED) so that it is actually received on or before 4:00 pm prevailing Eastern Time on May 31, 2012 for Non-Governmental Claimants OR on or before 4:00 pm prevailing Eastern Time on August 27, 2012 for Governmental Claimants.

BY MAIL TO:	BY MESSENGER OR OVERNIGHT DELIVERY TO:
BMC Group, Inc	BMC Group, Inc
Attn: Cliffs Claims Processing	Attn: Cliffs Claims Processing
PO Box 3020	18675 Lake Drive East
Chanhausen, MN 55317-3020	Chanhausen, MN 55317

8. SIGNATURE: (See instruction #8)

Check the appropriate box.

- I am the creditor.
 I am the creditor's authorized agent. (Attach copy of power of attorney, if any.)
 I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.)
 I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: Robert B. Long, Jr.
 Title: President
 Company: Long, Parker, Warren, Anderson & Payne, P.A. *Robert B. Long* 5-30-2012
 Address and telephone number (if different from notice address above): _____ (Signature) _____ (Date)

 Telephone number: _____ email: _____

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

LIST OF DEBTORS:

Case Name	Case Nbr
The Cliffs Club & Hospitality Group, Inc.	12-01220
CCHG Holdings, Inc.	12-01223
The Cliffs at Mountain Park Golf & Country Club, LLC	12-01225
The Cliffs at Keowee Vineyards Golf & Country Club, LLC	12-01226
The Cliffs at Walnut Cove Golf & Country Club, LLC	12-01227
The Cliffs at Keowee Falls Golf & Country Club, LLC	12-01229
The Cliffs at Keowee Springs Golf & Country Club, LLC	12-01230
The Cliffs at High Carolina Golf & Country Club, LLC	12-01231
The Cliffs at Glassy Golf & Country Club, LLC	12-01234
The Cliffs Valley Golf & Country Club, LLC	12-01236
Cliffs Club & Hospitality Service Company, LLC	12-01237

Statement of Fees & Disbursements

In Account with

Long, Parker, Warren, Anderson & Payne, P.A.

Attorneys at Law · EIN 56-1213110
P.O. Box 7216, Asheville, North Carolina 28802
14 S. Pack Square, Ste. 600, Asheville, North Carolina 28801
Phone: (828) 258-2296 Fax: (828) 253-1073

Invoice Number: 20066196
Invoice Date: May 30, 2012
File Number: 2011204

To: **The Cliffs at Walnut Cove Golf & Country Club, LLC** Matter: WNC Land, LLC
3598 Highway 11
Travelers Rest SC 29690

Attorney: Robert B. Long, Jr.

Reference: For Professional Services Rendered from Sep 28, 2011 to Jan 24, 2012

<i>OUR FEES - In connection with the above matter</i>			<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Sep 28, 2011	RBL	Receive inquiry from Mary Campbell about Land of WNC legal action; Fran notifies that we are getting extension; Fran prepares the extension and order to November 2; this will be one that requires new \$20 fee and dictate letter to Kim Lay, Plaintiff's attorney transmitting same	.20	325.00	65.00
Oct 31, 2011	RBL	Study of Land of WNC golf membership lawsuit; read documents and note questions that I need to ask Nate Weyand before filing answer on November 2	1.00	325.00	325.00
Nov 1, 2011	RBL	Call Nate Weyand on his cell in the evening hours and confirm that what I have stated about the master membership plan and the purchase agreement with membership credit addendum are correct; there is nothing in the agreements addressing refund for a downgrade in membership classification, which is not good; after brief review of agreements again, dictate draft answer to be reviewed tomorrow after it is typed	.75	325.00	243.75
Nov 2, 2011	RBL	Call Nate Weyand about whether Della Vecchia had in fact complied with the membership agreement as alleged; it appears that he has; then review and revise the draft Answer and ready for filing	.50	325.00	162.50
Nov 2, 2011	RBL	Dictate letter to Kim Lay enclosing Answer	.10	325.00	32.50

Continued on Page No. 2

In Account with
Long, Parker, Warren, Anderson & Payne, P.
14 S. Pack Square, Ste. 600
Asheville, North Carolina 28801

Invoice Number: **20066196**
Invoice Date: **May 30, 2012**
File Number: **2011204**

Continued from Page No. 1

Dec 20, 2011	RBL	Prepare motion and order for extension of time to respond to discovery; send it over to be signed and dictate letter to transmit it to Kim Lay; then call Kim Lay and leave word for her to give me a call.	.25	325.00	81.25
Jan 19, 2012	RBL	Review of discovery requests and materials on hand; call for Nate Weyand and he is no longer with the Cliffs; speak with Mary Campbell, who has given us a link to pick up on known witnesses, etc.; review both of the documents we have on hand at this time with respect to the downgrade of club membership and see the differences; prepare the responses to the Request for Admissions, there is no document attached to the request, so send both of the agreements with respects to the dates they were in effect for the Plaintiff LLC, i.e., when he purchased in late 2008 and when he downgraded in 2010; get part of answers to Interrogatories and Request for Production done, but go ahead and send the responses to Request for Admissions today	1.20	325.00	390.00
Jan 24, 2012	RBL	Call and call back from Kim Lay; explain the request for admission response and that I will be a little bit delayed in getting the rest of the discovery to her because of Nate Weyand leaving Cliffs employment, but will get it together, hopefully, by the end of the week and on to her, as I have the documents, but not the other information; Kim said she was okay with that	.20	325.00	65.00

Total Fees

1,365.00

GJE 31569

Invoice Total: \$1,365.00

LONG, PARKER, WARREN, ANDERSON & PAYNE, P.A.

ATTORNEYS AT LAW
14 SOUTH PACK SQUARE, SUITE 600
ASHEVILLE, NORTH CAROLINA 28801

(828) 258-2296

ROBERT B. LONG, JR.
WILLIAM A. PARKER
STEVE R. WARREN
PHILIP S. ANDERSON
RONALD K. PAYNE
ANDREW B. PARKER
RODNEY G. HASTY

MAILING ADDRESS
Post Office Box 7216
Asheville, NC 28802

FACSIMILE
(828) 253-1073

May 30, 2012

VIA FEDERAL EXPRESS

BMC Group, Inc.
Attn: Cliffs Claims Processing
18675 Lake Drive East
Chanhassen, MN 55317

**RE: Creditor: Long, Parker, Warren, Anderson & Payne, P.A.
(Formerly Long, Parker, Warren & Jones, P.A.)
P. O. Box 7216, Asheville, NC 28802**

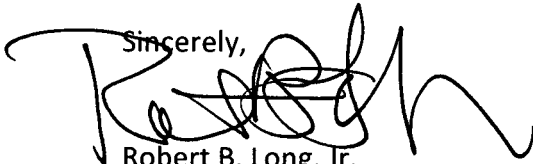
**Debtor: The Cliffs at Walnut Cove Golf & Country Club, LLC
(9879) (12-01227)**

Gentlemen:

Enclosed herewith is Proof of Claim for the above Creditor with respect to the above Debtor and attachments for a claim for legal services rendered in connection with a legal action filed against The Cliffs at Walnut Cove Golf & Country Club, LLC, as described in the statement attached to the Proof of Claim. I also enclose herewith a copy of the same to note the receipt of it and our enclosed postage prepaid envelope for return of the copy of the filed Proof of Claim for our records.

In the event you need any further information in this respect, please advise.

Sincerely,


Robert B. Long, Jr.

RBLjr/fg
Enclosures

FedEx MEMO Package
US Airbill

EXPRESS

FedEx Tracking Number

8996 6698 6751

Form ID No. **0215**

Recipients Copy

MUR 1

1 From This portion can be removed for Recipients records.

Date **5/30/2012**

Tracking Number

899666986751

Sender's Name **Robert B. Long, Jr.**

Phone

828 258-2296

Company **LONG PARKER WARREN ET AL PA**

Address **14 S BACK SQ STE 600**

Dept./Room/Store/Room

City **ASHEVILLE**

State **NC**

ZIP **28801-3506**

2 Your Internal Billing Reference

The Cliffs

3 To Recipients

Name **BMC GROUP, INC.**

Phone

MAY

Company **ATTN: Cliffs Claims Processing**

Address **18675 Lake Drive East**

Dept./Room/Store/Room

Address Use this line for the HOLD location address or for continuation of your shipping address.

City **Chanhausen**

State **MN**

ZIP **55317**

0448386735



8996 6698 6751

4 Express Package Service * To most locations. NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs. For packages over 150 lbs, call your FedEx Express freight rep. 800.468.1111

Next Business Day

2 or 3 Business Days

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

NEW FedEx 2DAY AM
Second business morning*
Secondary Delivery NOT available.

FedEx Priority Overnight
Next business morning*. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx 2Day
Second business afternoon*. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Standard Overnight
Next business afternoon.
Secondary Delivery NOT available.

FedEx Express Saver
Third business day*
Secondary Delivery NOT available.

5 Packaging * Declared value limit: \$500.

FedEx Envelope*

FedEx Pak*

FedEx Box

FedEx Tube

Other

RECEIVED
Special Handling and Delivery Signature Options

SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day AM, or FedEx Express Saver.

No Signature Required
No recipient signature required. Delivery is guaranteed by delivery.

Direct Signature
Someone in recipient's address may sign for delivery. See options.

Indirect Signature
If no one is available at recipient's address, someone at neighboring address may sign for delivery. See options. residential deliveries only. See options.

HOLD WEEKEND
HOLD WEEKEND. NOT available for FedEx First Overnight.

Dry Ice
Dry Ice. 8.00 1845 x _____ x _____ lb

HOLD SATURDAY
HOLD location address. FedEx Priority Overnight and FedEx 2Day to select locations.

Cargo Aircraft Only

7 Payment Bill to:

Sender I will be paying

Recipient

Third Party

Credit Card

Cash/Check

Total Packages **1**

Total Weight _____ lbs.

Credit Card Num. _____

Enter FedEx Acct. No. or Credit Card No. below

Acct. No.

Acct. No.

Obtain recip. Acct. No.

Cash/Check