

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)	
)	
CCHG LIQUIDATION CO.,)	CHAPTER 11
TAX ID: XX-XXX6338)	CASE # 12-01220
)	
)	Substantively Consolidated
Debtor.)	

ALSCO’S RESPONSE TO DEBTOR’S OBJECTION TO THE ALLOWANCE OF CLAIM NO. 378 FILED BY ALSCO

NOW COMES AlSCO, creditor of CCHG Liquidation Co. (hereinafter “Debtor”), and responds to Debtor’s Objection to the Allowance of Claim No. 378 filed by AlSCO.

In support of this Response, AlSCO shows the Court as follows:

1. This matter is a core proceeding pursuant to 28 U.S.C. §157, and the Court has jurisdiction pursuant to 28 U.S.C. §§ 151, 157 and 1334. The Court has the authority to hear this matter pursuant to the General Order of Reference entered by the District of South Carolina.
2. On February 28, 2012 (the “Petition Date”), Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”).
3. On April 30, 2012, AlSCO timely filed a Proof of Claim (“Claim 378”) for \$45,312.07. A copy of Claim 378 is attached and incorporated herein as Exhibit A.
4. In the Objection, the Debtor states the grounds for the objection to Claim 378 are based on Section 502(d) of the Bankruptcy Code. No further detail is given in the Objection.
5. AlSCO denies that the Debtor has grounds to object to Claim 378 under Section 502(d) of the Bankruptcy Code and requests a hearing thereon.

WHEREFORE, Also prays for the Court to deny Debtor's Objection to Claim and to grant such other and further relief as the Court deems just and appropriate.

This the 25th day of April, 2013.

s/Kristin Decker Ogburn
Kristin Decker Ogburn
Attorney for Also

Of Counsel:

Horack, Talley, Pharr & Lowndes
2600 One Wells Fargo
301 S. College St.
Charlotte, NC 28202-6038
Telephone (704) 377-2500
Telefax: (704) 372-2619

CERTIFICATE OF SERVICE

This is to certify that the foregoing Response to Debtor's Objection to the Allowance of Claim No. 378 Filed by Alseo, was served upon Debtor, Debtor's Attorney and US Bankruptcy Administrator, by United States mail or electronically, addressed as follows:

CCHG Liquidation Co. (US Mail)
3598 Highway 11
Travelers Rest, SC 29690

McKenna Long & Aldridge, LLP (Electronically)
Bryan E. Bates
Gary W. Marsh
John M. Levengood
303 Peachtree St., Suite 5300
Atlanta, GA 30308

Dana Elizabeth Wilkinson (Electronically)
365-C East Blackstock Rd.
Spartanburg, SC 29301

Office of the United States Trustee (Electronically)
John Timothy Stack
Joseph F. Buzhardt, III
Linda Barr
1835 Assembly St., Suite 953
Columbia, SC 29201

Dated this 25th day of April, 2013.

s/ Kristin Decker Ogburn
Kristin Decker Ogburn
Attorney for Summit Avenue Atherton, LLC
North Carolina State Bar Co. 20506



UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH CAROLINA		PROOF OF CLAIM	 Your Claim is Scheduled As Follows: Schedule/Claim ID: s15485 AMOUNT/CLASSIFICATION: \$47,594.52 UNSECURED
Name of Debtor: Cliffs Club & Hospitality Service Company, LLC		Case Number: 12-01237	The amounts reflected above constitute your claim as scheduled by the Debtor or pursuant to a filed claim. If you agree with the amounts set forth herein, and have no other claim against the Debtor, you do not need to file this proof of claim EXCEPT as stated below. If the amounts shown above are listed as Contingent, Unliquidated or Disputed, a proof of claim must be filed except as provided in the accompanying bar date notice. If you have already filed a proof of claim with the Bankruptcy Court or BMC, you do not need to file again.
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) :			
Name and address where notices should be sent:  29347866010086 AlSCO SEND UPS #3V334X 4700 Dwight Evans Rd Charlotte, NC 28217			THIS SPACE IS FOR COURT USE ONLY
Creditor Telephone Number 704 586-1700 email: gspowers@alsco.com			
Name and address where payment should be sent (if different from above):		<input type="checkbox"/> 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.	
Payment Telephone Number () email:		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number (if known): Filed on:	
1. AMOUNT OF CLAIM AS OF DATE CASE FILED \$ <u>45312.07</u>			
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. <input type="checkbox"/> 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: <u>Delivered goods.</u> (See instruction #2)			
3. LAST FOUR DIGITS OF ANY NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR:		3a. Debtor may have scheduled account as: _____ (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: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Value of Property: \$ _____ Annual Interest Rate: _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> 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: \$ _____			
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:			
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).		<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8).	
<input type="checkbox"/> 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).		<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5).	
<input type="checkbox"/> 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).		<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a) (_____).	
		<input type="checkbox"/> 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.			
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)			

EXHIBIT A

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:
 BMC Group, Inc
 Attn: Cliffs Claims Processing
 PO Box 3020
 Chanhassen, MN 55317-3020

BY MESSENGER OR OVERNIGHT DELIVERY TO:
 BMC Group, Inc
 Attn: Cliffs Claims Processing
 18675 Lake Drive East
 Chanhassen, MN 55317

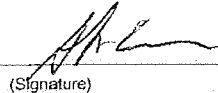
8. SIGNATURE: (See instruction #8)

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: Alan Sowers
 Title: General manager
 Company: AlSCO, Inc.


 (Signature)

26 April 2012
 (Date)

Address and telephone number (if different from notice address above):

Telephone number: 704-586-1700 email: asowers@alsco.com

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