

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

IN RE:	)	
	)	<b>CHAPTER 11</b>
The Cliffs Club & Hospitality Group, Inc.,	)	
et al., d/b/a The Cliffs Golf & Country	)	<b>Case No. 12-1220</b>
Club,	)	
	)	<b>Jointly Administered</b>
Debtors.	)	
_____	)	

**RESPONSE TO DEBTOR’S OBJECTION TO THE ALLOWANCE OF CLAIM  
NO. 1155 FILED BY KEOWEE INVESTMENT PROPERTIES, LLC**

Keowee Investment Properties, LLC (“KIP”) files this response to the *Debtor’s Objection to the Allowance of Claim No. 1155 Filed by Keowee Investment Properties, LLC* [Docket 915] and, in support thereof, states as follows.

1. On or about May 31, 2012 KIP filed an unsecured non-priority claim against the above-captioned Debtors (the “Debtors”).
2. On or about August 1, 2012, KIP filed an objection to confirmation of the Debtors’ chapter 11 plan of reorganization (the “Plan”).
3. The Debtors and KIP ultimately resolved KIP’s objection to the Plan and entered into an agreement embodied in the form of the document attached hereto as Exhibit “A”.
4. KIP respectfully requests that the Debtors’ objections to KIP’s claim be overruled to the extent that such claim objection purports to alter or modify the agreement attached hereto as Exhibit “A”.

WHEREFORE, KIP respectfully prays unto the Court for the relief requested herein and, specifically, requests that the Court overrule the Debtors’ claim objection to the extent the claim

objection purports in any way to modify the consensual treatment arrived in the Debtors' Plan as embodied in the agreement attached hereto as Exhibit "A".

DATED: May 1, 2013  
Greenville, SC

Respectfully Submitted:

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of **RESPONSE TO DEBTOR'S OBJECTION TO THE ALLOWANCE OF CLAIM NO. 1155 FILED BY KEOWEE INVESTMENT PROPERTIES, LLC** was filed electronically and was therefore served electronically on those entities that have properly registered for such electronic service and by United States Mail, first class, proper postage affixed to the following parties on May 1, 2013:

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