

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re:

The Cliffs Club & Hospitality Group, Inc., *et al.*,¹ *d/b/a* The Cliffs Golf & Country Club,

Debtors.

CHAPTER 11

Case No. 12-01220

Joint Administration Pending

DEBTORS' MOTION FOR EMERGENCY HEARING ON MOTION OF DEBTORS' FOR ORDER AUTHORIZING THE DEBTORS TO (A) PREPARE A CONSOLIDATED LIST OF CREDITORS AND EQUITY SECURITY HOLDERS IN LIEU OF A MAILING MATRIX, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' FIFTY LARGEST UNSECURED CREDITORS, AND (C) MAIL INITIAL NOTICES

PLEASE TAKE NOTICE THAT the undersigned, on behalf of The Cliffs Club & Hospitality Group, Inc. and its affiliated debtors in the above-captioned Chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), does hereby move before this Court for an order granting an emergency hearing on Motion of Debtors' for Order Authorizing the Debtors to (a) Prepare a Consolidated List of Creditors and Equity Security Holders in Lieu of a Mailing Matrix, (b) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, and (c) Mail Initial Notices (the "Motion"), filed contemporaneously herewith. In support of this request for an emergency hearing, and pursuant to SC LBR 9013-1(d), the Debtors state as follows:

¹ The Debtors, followed by the last four digits of their respective taxpayer identification numbers, are as follows: The Cliffs Club & Hospitality Group, Inc. (6338); CCHG Holdings, Inc. (1356); The Cliffs at Mountain Park Golf & Country Club, LLC (2842); The Cliffs at Keowee Vineyards Golf & Country Club, LLC (5319); The Cliffs at Walnut Cove Golf & Country Club, LLC (9879); The Cliffs at Keowee Falls Golf & Country Club, LLC (3230); The Cliffs at Keowee Springs Golf & Country Club, LLC (2898); The Cliffs at High Carolina Golf & Country Club, LLC (4293); The Cliffs at Glassy Golf & Country Club, LLC (6559); The Cliffs Valley Golf & Country Club, LLC (6486); Cliffs Club & Hospitality Service Company, LLC (9665).

Pursuant to the Motion, the Debtors seek authority to, *inter alia*, prepare a consolidated list of creditors and equity security holders in lieu of a mailing matrix, and file a consolidated list of the Debtors' fifty largest unsecured creditors. As described in more detail in the Motion, the Debtors have approximately 8,000 creditors and parties in interest. Converting the Debtors' computerized information to a format compatible with the matrix requirements would be an extremely burdensome task and would greatly increase the risk and recurrence of error with respect to information already intact on computer systems maintained by the Debtors or their agents. Because many creditors are shared among the Debtors, and the Debtors would therefore have to expend significant resources and effort to reconcile which claims may be asserted against which Debtors, the Debtors request authority to file a single, consolidated list of their fifty (50) largest general unsecured creditors on a consolidated basis. Requiring each of the Debtors to file a separate top twenty (20) list of creditors in each of their respective cases would generate numerous names, addresses and claim amounts of materially varying sizes. The Debtors do not believe that such voluminous and disjointed filings would facilitate the Office of the United States Trustee for the District of South Carolina (the "U.S. Trustee"), or any other parties', review of creditor claims. In addition, the exercise of compiling eleven (11) separate lists of twenty (20) would consume an excessive amount of the Debtors' scarce time and resources. In light of the foregoing, the Debtors submit that authority to file a single, consolidated list of the fifty (50) largest unsecured creditors in these cases on a consolidated basis is in the best interests of the estates and will facilitate the efficient and orderly administration of these cases

Thus, the Debtors respectfully request that the Motion be heard on an emergency basis, at the earliest possible time. Finally, counsel for the Debtors certifies that representatives of the

Debtors have made substantial good faith efforts to resolve these matters with other parties in interest to the Motion, but such efforts have been unsuccessful.

WHEREFORE, the Debtors respectfully request that the Court enter an order granting their request for an emergency hearing on the Motion.

Dated: February 28, 2012

Respectfully submitted,

/s/ Däna Wilkinson

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-and-

/s/ J. Michael Levensgood

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