

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 FOR ENTRY OF
ORDER ESTABLISHING CERTAIN NOTICE, CASE MANAGEMENT AND
ADMINISTRATIVE PROCEDURES

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 for Entry of Order Establishing Certain Notice, Case Management and Administrative Procedures (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:

Pursuant to the Motion, the Debtors seek authority to implement certain notice, case management and administrative procedures (as such may be modified or amended, the "Case Management Procedures") in connection with the administration of the Chapter 11 cases. A

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).

copy of the Case Management Procedures is attached as Schedule 1 to the proposed order granting the Motion. The Debtors request that, to the extent the Case Management Procedures conflict with or diverge from the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the order designating the Chapter 11 cases as Complex Chapter 11 Cases entered in these cases or the Operating Order, the Case Management Procedures shall govern and supersede such provisions and rules. As described in more detail in the Motion, the Debtors anticipate that they will have thousands of creditors, potential creditors and other parties in interest. Thus, they believe that hundreds of parties may request service of filings pursuant to Bankruptcy Rule 2002 in the Chapter 11 cases. The Debtors also expect that numerous motions and applications will be filed in the Chapter 11 cases in pursuit of various forms of relief. As a result, the Debtors believe the Case Management Procedures are necessary to streamline immediately the administration of the Chapter 11 cases and to promote efficiency and organization to the greatest extent possible. The Debtors submit that immediate approval of the Case Management Procedures is in the best interests of the Debtors, their estates and their creditors.

The Debtors' failure to obtain immediate approval of the Case Management Procedures would result in immediate and irreparable harm to their estates. 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-

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