

In re
CCHG Liquidation Co.,

Chapter 11
CASE NO. 12-01220/W

Debtor(s)

RESPONSE TO OBJECTION
OF CLAIM OF
PALMER FREEMAN

To the Debtor and to all creditors and parties in interest:

Counsel for Palmer Freeman (hereinafter "claimant"), responding to the Debtor's Omnibus Objection to the allowance of claims to Properly Characterize Claims as Class 7 Claims Under the Confirmed Plan (hereinafter "the objection"), filed July 12, 2013 (document Nos. 1323 and 1324), would state the following:

1. The factual recitations of the history of the case are accepted as true.
2. The Claimant accepts the Court's jurisdiction over this class and this matter.
3. The Claimant respectfully objects to the relief requested by the Debtor and requests the Court further inquire into the treatment of claimant's Claim. The Claimant further requests the Court evaluate the Claimant's Claim under 11 U.S.C. §502(a) and (b).
4. Specifically, under §502(b), it provides: "the Court, after notice and a hearing, shall determine the amount of such claim in lawful currency of the United States as of the date of filing of the petition and shall allow such claim in such amount...."
5. Claimant alleged the value of his claim to be \$10,000.00.
6. Claimant was granted an "honorary membership" in approximately 2002. Said membership allowed the claimant the right to use the facilities of the Debtor (and its predecessors) for social purposes, such as dining on premises and playing golf. Claimant was still required to pay any costs necessary to exercise these privileges.
7. Claimant is unaware of a comparable value for his asset, and requests the Court determine the amount of such claim. In the alternative, Claimant requests the Court grant him an asset of equal value, such as an honorary membership to the new facilities of the Debtor. To the extent classifying Claimant's claim as a "Class 7" claim would significantly reduce the value of Claimant's claim, Claimant objects to the same.
8. Claimant requests the Court conduct a hearing and consider such evidence as the Court deems relevant, including testimony of the Claimant, to establish the value of Claimant's claim.

/s/ P. John Freeman.
P. John Freeman
District Court ID # 6111
Halford, Niemiec & Freeman
238 Rockmont Dr.
Fort Mill, SC 29708
(803) 547-6618

Document Page 2 of 2
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re
CCHG Liquidation Co.,

Chapter 11
CASE NO. 12-01220/W

CERTIFICATE OF SERVICE

Debtor(s)

The undersigned hereby certifies that she served the foregoing Objection to Claim to parties in interest entitled to such notice at the addresses shown below, except for the trustee and the undersigned who are served by electronic notice of filing.

Ms. Dana Wilkinson
Law Office of Dana Wilkinson
365-C East Blackstock Rd.
Spartanburg, SC 29301

Mr. Bryan E Bates
McKenna Long & Aldridge, LLP
303 Peachtree St., Ste. 5300
Atlanta, GA 30308

Date: August 12, 2013

/s/ Regina Nonemaker
Regina Nonemaker
Paralegal to
P John Freeman
Halford, Niemiec & Freeman
238 Rockmont Dr.
Fort Mill, SC 29708
District ID #: 6111
(803) 547-6618
Attorney for Palmer Freeman