

United States District Court
District of South Carolina
SPARTANBURG Division

The Cliffs Club and Hospitality Case No. 12-01220-W
Group, Inc.
Debtor(s) Chapter 11
Amended Motion in Support of
Vice Pro Hac Application

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Jonathan B. Alter

be admitted pro hac vice in the above-captioned case as associate counsel. Since the filing of the original Motion and Application, the Unsecured Creditors Committee has requested that Jonathan B. Alter serve as its Counsel the and the Undersigned serve as its Local counsel, I understand that:

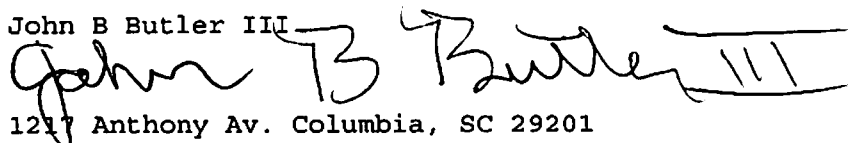
1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure or other document that I serve or file in this court, and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted pro hac vice; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted pro hac vice; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

Prior to filing this motion, I conferred with opposing counsel who has indicated the following position to this Motion:

will likely oppose x does not intend to oppose

Prior to filing this motion, I attempted to confer with opposing counsel but was unable to do so for the following reasons:

No duty of consultation is required because the opposing party is pro se

3/12/12 

1217 Anthony Av. Columbia, SC 29201

Local Counsel for Unsecured Creditors Committee

District Court ID# 1632; 803-256-9661; 803-765-0704
fax; jbbiii@bellsouth.net

United States District Court
District of South Carolina
SPARTANBURG Division

The Cliffs Club and Hospitality Group, Inc.) Case No. 12-01220-W
Debtor(s)) Chapter 11
Application/Affidavit for Pro Hac Vice Admission

1. Name: Jonathan B. Alter
First Middle Last

2. Residence. I reside in the following state: Connecticut
If a resident of South Carolina, Applicant should indicate months/years of residence:

3. Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Bingham McCutchen LLP

Mailing address: One State Street, Hartford, CT 06103-3178

Telephone number: 860.240.2969

Facsimile number: 860.240.2800

Email address: jonathan.alter@bingham.com

(Application will not be considered without an e-mail address to receive electronic notification.)

4. Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all federal rules, and with the Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.1.08 and/or Local Criminal Rule 57.1.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹

5. Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of Connecticut where I regularly practice law. Attached is my certificate of good standing.

6. Additional Bar Membership. I have been admitted to practice before the following courts: (List all courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other

¹ This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

states or the District of Columbia.)By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good standing	
		Yes	No
Connecticut	Dec. 8, 1989	x	
New York	January 1989	x	
U.S. District Court, District of Connecticut	September 10, 1990	x	
U.S. District Court, Eastern District of New York	May 20, 1994	x	
U.S. District Court, Northern District of New York	April 21, 1998	x	
U.S. District Court, Southern District of New York	June 26, 1990	x	
U.S. District Court, Western District New York	October 30, 2007	x	
U.S. Court of Appeals, Second Circuit	April 17, 1998	x	

7. Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? Yes No. (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided in camera but that fact shall be revealed below.)
8. Curtailment of Prior Pro Hac Vice Admission. Have you ever had any application for admission pro hac vice in this or any other jurisdiction denied or any pro hac vice admission revoked? Yes No. (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)
9. Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction? Yes No. (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement)
10. Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States? Yes No. (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)
11. Present and Previous Pro Hac Vice in this Court. Have you, within the last ten (10) years, filed an application to appear pro hac vice in the United States District Court for the District of South Carolina or another Court in the state of South Carolina? Yes No. (If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary .
12. Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

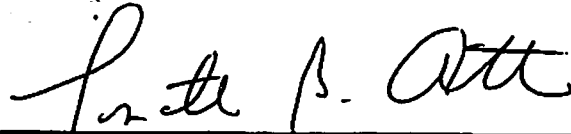
John B Butler III

1217 Anthony Av. Columbia, SC 29201

District Court ID# 1632; 803-256-9661; 803-765-0704 fax;
jbbiii@bellsouth.net

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.1.04, 83.1.05, and 83.1.06 or Local Criminal Rules 57.1.04, 57.1.05, and 57.1.06 as appropriate. Local counsel of record may attend discovery proceedings.

- 13. Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case:
- 14. Filing Fee. I affirm that the filing fee of one hundred dollars (\$100) has been paid in accordance with Local Civil Rule 83.1.05 or Local Criminal Rule 57.1.05 or paid herewith.
- 15. Electronic Notification. By submitting this application, I consent to electronic notification.
- 16. Represented Party/Parties. I seek to represent the following party/parties: Unsecured Creditors Committee



Signature of Applicant

Sworn to and subscribed before me
this 12th day of March 2012.



A Notary Public
of the State of Connecticut

My Commission expires:

ELLEN B. TALBOT
NOTARY PUBLIC
MY COMMISSION EXPIRES OCT. 31, 2014

*State of Connecticut
Supreme Court*

I, Michele T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

*Do hereby certify, that, in the Superior Court at Hartford ,
on the 8th day of December, 1989.*

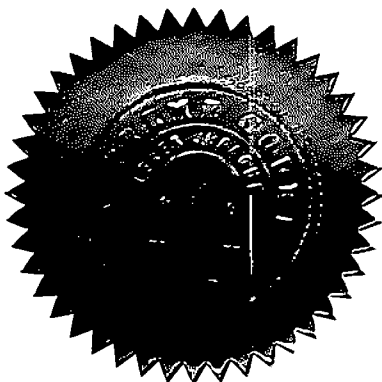
Jonathan Bradley Alter

of

Avon, Connecticut

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.

In Testimony Whereof, I have hereunto set my hand and affix the Seal of the Supreme Court of the State of Connecticut, at Hartford, this day March 1, 2012.



Michele T. Angers
Michele T. Angers

Chief Clerk