

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In re:

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

**Debtors.**

**CHAPTER 11**

**Case No. 12-01220**

**Joint Administration Pending**

**DEBTORS' MOTION FOR EMERGENCY HEARING ON APPLICATION OF THE  
DEBTORS FOR ORDER AUTHORIZING RETENTION OF BMC GROUP, INC. AS  
CLAIMS, NOTICING, AND BALLOTING AGENT NUNC PRO TUNC TO THE  
PETITION DATE**

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 the Application of the Debtors for Order Authorizing Retention of BMC Group, Inc. ("BMC") as Claims, Noticing, and Balloting Agent Nunc Pro Tunc to the Petition Date (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:

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<sup>1</sup> 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 hereby seek the entry of an order, pursuant to 28 U.S.C. § 156(c), Bankruptcy Rule 2002 and Local Rule 2081-1: (a) appointing BMC to perform certain claims, noticing and other administrative functions in these Chapter 11 cases (in such role, the "Claims Agent"); and (b) authorizing the Debtors to compensate BMC for its services and reimburse BMC for any related expenses in accordance with applicable provisions of the agreement for services between BMC and the Debtors. As described in more detail in the Motion, Local Rule 2081-1 requires that debtors with more than 500 creditors seek to retain a claims agent contemporaneously with the filing of the petition. The Debtors have approximately 8,000 creditors and other parties in interest, many of whom are expected to file proofs of claim. The Debtors believe that noticing, receiving, docketing and maintaining proofs of claim would impose heavy administrative and other burdens upon the Debtors, the Court and the Clerk's Office. The Debtors believe that immediate approval of BMC's services in these cases will expedite service of notices, will streamline the claims administration process and will generally ease the burden on the Debtors to perform administrative tasks when their attention is best focused elsewhere. Thus, the Debtors' failure to obtain immediate approval of BMC's retention would result in immediate and irreparable harm to their estates, and 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.

*[signature follows]*

Dated: February 28, 2012

Respectfully submitted,

/s/ Däna Wilkinson

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-and-

/s/ J. Michael Levensgood

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