

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 MOTION FOR AN  
EXTENSION OF TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES,  
SCHEDULES OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND  
STATEMENT OF FINANCIAL AFFAIRS**

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 an Extension of Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, and Statement of Financial Affairs (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:

<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 seek an enlargement of the time to file their schedules of assets and liabilities and statements of financial affairs (the "Schedules"). As described in more detail in the Motion, section 521 of the Bankruptcy Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure require the Debtors to file their Schedules within 14 days after the Petition Date. Local Rule 1007-1 provides that the Court may grant an enlargement of the time to file schedules and other documents required "only on motion for cause shown and on notice to the United States Trustee, any committee elected under § 705 or appointed under § 1102 of the Code, trustee, examiner, or other party as the court may direct. Notice of an extension shall be given to the United States trustee and to any committee, trustee, or other party as the court may direct." SC LBR 1007-1. By the Motion, the Debtors respectfully request that the Court extend the 14-day period to submit their Schedules for an additional thirty (30) days, which is from March 13, 2012 through and including April 12, 2012. While the Debtors are dedicating their resources to the task of diligently and expeditiously preparing the Schedules with respect to the thousands of creditors and parties in interest in these cases, the Debtors' resources are limited, and must also be focused on maintaining the Debtors' continued operations. In view of the amount of work entailed in completing the Schedules and the competing demands upon the Debtors' personnel to stabilize business operations during the initial postpetition period, the Debtors respectfully submit that they will be unable to fully and accurately complete the Schedules within the required 14-day time period. Thus, the Debtors' failure to obtain the requested extension 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.

Dated: February 28, 2012

Respectfully submitted,

/s/ Däna Wilkinson

Däna Wilkinson  
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-and-

/s/ J. Michael Levensgood

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