

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 ORDER AUTHORIZING (I) CONTINUED USE OF EXISTING CASH MANAGEMENT SYSTEM, (II) CONTINUED USE OF EXISTING BANK ACCOUNTS, (III) AUTHORIZING CONTINUED USE OF EXISTING BUSINESS FORMS, AND (IV) GRANTING A WAIVER OF INVESTMENT AND DEPOSIT REQUIREMENTS**

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 Debtors' Motion For an Order Authorizing, But Not Directing (i) the Continued Maintenance and Use of the Debtors' Existing Cash Management System, (ii) the Continued Maintenance and Use of the Debtors' Existing Bank Accounts, (iii) the Continued Use of Existing Business Forms and Checks; and (iv) a Waiver of Investment and Deposit Requirements (the "Motion"), filed contemporaneously

<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).

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 entry of an order authorizing the Debtors to, *inter alia*, continue to maintain and use their existing cash management system, to continue to maintain and use their existing bank accounts, and to continue to use their existing business forms and checks. As described in more detail in the Motion, before the commencement of these cases, the Debtors used a cash management system to collect, transfer and disburse funds generated by their operations and to accurately record all such transactions as they are made (collectively, the "Cash Management System") in the ordinary course of business. The Debtors' smooth transition into, and out of, Chapter 11 depends on their ability to maintain their bank accounts and operate their Cash Management System without interruption. Requiring the Debtors to adopt a new, segmented cash management system at this early and critical stage of these Chapter 11 cases would be expensive, would create unnecessary administrative burdens, and would be much more disruptive than productive. Any such disruption would have an immediate adverse impact upon the Debtors' ability to reorganize, and would result in immediate and irreparable harm to the Debtors' estates. Thus, the Debtors respectfully request that this 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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