

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re: :
: CHAPTER 11
The Cliffs Club & Hospitality Group, Inc., et al.¹, :
d/b/a The Cliffs Golf & Country Club, : CASE NO. 12-01220-JW
: :
Debtors. : *Joint Administration Pending*

**MOTION IN SUPPORT OF
PRO HAC VICE APPLICATION OF MARTHA A. MILLER**

The undersigned local counsel hereby moves, in conjunction with the attached Application and Affidavit, that Martha A. Miller be admitted *pro hac vice* in the above-captioned cases as associate counsel. As 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

¹The 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).

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).

X Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as 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 reason(s):

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

Haynsworth, Sinkler Boyd, PA
Firm Name

1201 Main Street, 22nd Floor (29201)
Street Address or Post Office Box

Columbia, South Carolina 29211-1889
City, State, Zip Code

(803) 779-3080
Telephone Number

Louise M. Johnson
Name of Local Counsel

/s/ Louise M. Johnson
Signature of Local Counsel

Local Counsel for
William and Elaine Clear

SC Federal Bar No. 7509

UNITED STATES BANKRUPTCY COURT
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In re: :
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: :
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APPLICATION/AFFIDAVIT FOR PRO HAC VICE ADMISSION

(1) Name. Martha A. Miller
First Middle Last

(2) Residence. I reside in the following state: Georgia
If a South Carolina resident, 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: Schulten Ward & Turner, LLP
Mailing address: 260 Peachtree Street, NW Suite 2700 City/State/Zip Atlanta, Georgia 30303
Telephone number: (404) 688-6800
Facsimile number: (404) 419-2978
E-mail address: mam@swtlaw.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 applicable federal statutes, laws, and rules, including 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.²

¹ 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).

²This District 1 maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

- (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 Georgia 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 of the 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 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

Northern, Middle and Southern Districts of Georgia	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Eleventh Circuit Court of Appeals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Supreme Court of the United States	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

- (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* Admissions. 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:

Attorney Name:	<u>Louise M. Johnson (Fed ID # 7509)</u>
Firm Name:	<u>Haynsworth, Sinkler & Boyd, PA</u>
Street Address or Post Office Box:	<u>1201 Main Street, 22nd Floor (29201)</u>
City, State, and Zip Code:	<u>Columbia, South Carolina 29211-1889</u>
Telephone Number:	<u>(803) 779-3080</u>
E-Mail Address:	<u>cjohnson@hsblawfirm.com</u>

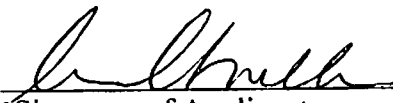
I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at 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.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.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.
None

(14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.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:
William and Elaine Clear



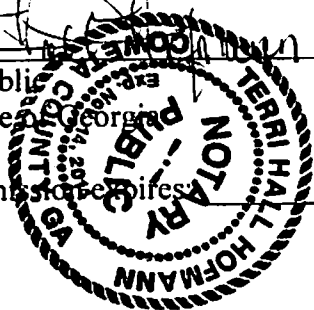
Signature of Applicant

Sworn to and subscribed before me
this 20th day of March, 2012.



Notary Public
of the State of Georgia

My Commission Expires: _____





**Supreme Court
State of Georgia**
STATE JUDICIAL BUILDING
Atlanta 30334

CAROL W. HUNSTEIN, CHIEF JUSTICE
GEORGE H. CARLEY, PRESIDING JUSTICE
ROBERT BENHAM
HUGH P. THOMPSON
P. HARRIS HINES
HAROLD D. MELTON
DAVID E. NAHMIAS
JUSTICES

THÉRÈSE S. BARNES, CLERK
JEAN RUSKELL, REPORTER

March 16, 2012

I hereby certify that Martha A. Miller, Esq., was admitted on the 29th day of Spetember, 1977, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date she has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court
hereto affixed the day and year first above written.

Therese A Barnes, Clerk