

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re:

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

Debtors.

CHAPTER 11

Case No. 12-01220

Joint Administration Pending

DEBTORS' MOTION FOR EMERGENCY HEARING ON DEBTORS' MOTION FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. §§ 105(A) AND 363(B) AUTHORIZING AND APPROVING DEBTORS' (I) RETENTION AND EMPLOYMENT OF GGG PARTNERS, LLC AND (II) EMPLOYMENT OF KATIE S. GOODMAN AS CHIEF RESTRUCTURING OFFICER, *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 Debtors' Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing and Approving Debtors' (i) Retention and Employment of GGG Partners, LLC and (ii) Employment of Katie S. Goodman as Chief Restructuring Officer, *Nunc Pro Tunc* to the Petition Date (the "Motion"), filed

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).

contemporaneously 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 and approving: (i) the employment and retention of GGG Partners, LLC (“GGG”) to provide restructuring management and advisory services to the Debtors, and (ii) the employment of Katie S. Goodman as Chief Restructuring Officer (the “CRO”) of the Debtors. As described in more detail in the Motion, GGG specializes in providing turnaround, crisis management and restructuring services for public and private companies, lenders, equity holders and impartial constituents (such as examiners or trustees). Ms. Goodman has more than 10 years of experience in the practice of turnarounds and restructuring, having participated in more than 30 successful turnaround engagements in a variety of industries. The Debtors retained GGG and Ms. Goodman to complete crucial time-sensitive and work-intensive projects in anticipation of the commencement of these Chapter 11 bankruptcy cases, with a focus on maximizing the Debtors’ going concern value while simultaneously allowing the Debtors’ senior management, as well as other employees, to concentrate on maintaining business operations. To provide such services in an effective manner, it will be necessary for GGG and Ms. Goodman to take necessary actions immediately upon the filing of these Chapter 11 cases. Moreover, both of the consensual and negotiated proposed orders relating to debtor-in-possession financing and the use of cash collateral require that the Debtors’ obtain immediate approval of the retention of GGG and Ms. Goodman pursuant to the Motion, and that their retention continue thereafter. Thus, the Debtors’ failure to obtain immediate approval of GGG’s and Ms. Goodman’s retention would result in immediate and irreparable harm to their estates; therefore, 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

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-and-

/s/ J. Michael Levengood

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