

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

| | | |
|--|---------------------------------|---|
| IN RE: The Cliffs Club & Hospitality Group, Inc., <i>et al</i> <p style="text-align: center;">Debtor.</p> |))))))) | CHAPTER 11 CASE NO. 12-01220-jw Joint Administration Pending |
| | | |

**Notice of Appearance and
Request for All Notices, Plans and Disclosure Statements**

Morgan Concrete Co. (“Creditor”) hereby enters its appearance and the law firm of Kenison, Dudley & Crawford, LLC, pursuant to Fed R Bankr P 9010, hereby enters their appearance as attorneys for Creditor with regard to all matters and proceedings in the above-captioned case, showing counsel's name, office address and telephone number as follows:

| | |
|--|--|
| Keven Kenison, Esq. Kenison, Dudley & Crawford, LLC 704 E. McBee Street Greenville, SC 29601 (864) 242-4899 (864) 242-4844(fax) | Townes B. Johnson III, Esq. Kenison, Dudley & Crawford, LLC 704 E. McBee Street Greenville, SC 29601 (864) 242-4899 (864) 242-4844(fax) |
|--|--|

Creditor, pursuant to Fed R Bankr P 2002, hereby requests that all notices required to be given under Fed R Bankr P 2002, including notices under Fed R Bankr P 2002(i), that, but for this request, would be provided only to committees appointed pursuant to the Bankruptcy Code or their authorized agents, be given to Creditor by due service upon its undersigned attorneys, Kenison, Dudley & Crawford, LLC, at the address stated above.

Creditor, pursuant to Fed R Bankr P 3017(a), further requests that all plans and disclosure statements filed herein by any party be duly served upon it and its undersigned attorneys.

Respectfully submitted this 13th day of April, 2012,

/s/ Townes B. Johnson III
Keven K. Kenison, Esq.
Townes B. Johnson III, Esq.
KENISON, DUDLEY & CRAWFORD, LLC
704 E. McBee Avenue
Greenville, SC 29601
Phone: (864) 242-4899
Fax: (864) 242-4844
Counsel to Creditor