

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

In re:

The Cliffs Club & Hospitality Group, Inc.,  
et al.,

Debtors.

Case No. 12-01220-jw  
Chapter 11

**MOTION IN SUPPORT OF *PRO HAC VICE*  
APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Gary H. Leibowitz be admitted *pro hac vice* in the above-captioned case 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
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).

Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion:  will likely oppose;  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):

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

**HAYNSWORTH SINKLER BOYD, P.A.**

**By:** /s/ Tara E. Nauful  
Tara E. Nauful  
District ID No. 5864

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Attorneys for US Foods, Inc.

April 17, 2012