

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In re:	)	Chapter 11
	)	
The Cliffs Club & Hospitality Group, Inc.,	)	Case No. 12-01220-jw
<i>et al., d/b/a The Cliffs Golf &amp; Country Club,</i>	)	
	)	Jointly Administered
Debtors.	)	
	)	

**NOTICE OF APPEARANCE, REQUEST FOR  
SERVICE OF PAPERS AND RESERVATION OF RIGHTS**

**PLEASE TAKE NOTICE** that the undersigned make their appearance in the above captioned matter on behalf of GE Capital, a creditor herein (hereafter, the Creditor), and pursuant to Fed. R. Bankr. P. 2002(g), 9007 and 9010(b), demand that all notices given or required in this case and all documents and all other papers served in this case be given to and served upon the persons below, at the offices, telephone numbers, fax numbers and e-mail addresses set forth below:

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**PLEASE TAKE FURTHER NOTICE** that the preceding request includes not only the notices and papers referenced in the rules and statutes specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand-delivery, telephone, electronically or otherwise, which affect Debtors or any interest in property of Debtors, including those orders and notices (1) that affect or seek to affect in any way any rights or interests of any creditor or party in interest in this case, including the Creditor, with respect to: (a) Debtor; (b) property of the estate or any proceeds thereof in which Debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that Debtors may seek to use; or (2) that require or seek to require any act, delivery of any property, payment or other conduct by the Creditor.

**PLEASE TAKE FURTHER NOTICE** that the Creditor intends that neither this Notice of Appearance, nor any later notice, appearance, pleading, claim or suit shall waive any right (1) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding relating to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs or recoupments to which the Creditor is or may be entitled to under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

DRISCOLL SHEEDY, P.A.

Date: 05/08/2012

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