

**UNITES STATES BANKRUTPCY COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**IN RE:** §  
**THE CLIFFS CLUB & HOSPITALITY** § **CASE NO. 12-01220**  
**GROUP, INC., ET AL.<sup>1</sup>, d/b/a THE** §  
**CLIFFS GOLF & COUNTRY CLUB** § **CHAPTER 11**  
§  
**DEBTORS.** § **Jointly Administered**

**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that Mitel Leasing, Inc. (“Mitel”) files this Notice of Appearance and Request for Notices and Papers pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this bankruptcy case be given and served on the Creditors by serving:

**Russell W. Mills, Esq.**  
[rmills@hhdulaw.com](mailto:rmills@hhdulaw.com)  
**Nicole L. Hay**  
[nhay@hhdulaw.com](mailto:nhay@hhdulaw.com)  
**HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.**  
**15303 Dallas Parkway, Suite 700**  
**Addison, Texas 75001**

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or

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<sup>1</sup> The Debtors, followed by the last four digits of their respective taxpayer identification number, 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 Gold & Country Club, LLC (9879); The Cliffs at Keowee Falls Golf & Country Club, LLC (3230); The Cliffs at Keowee Springs Gold & 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); and Cliffs Club & Hospitality Service Company, LLC (9665).

informal, written or oral, and whether transmitted or conveyed by mail, messenger delivery, telephone, facsimile, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings herein.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of the rights of Creditors (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs, or recoupments to which the Creditors are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 6, 2012

Respectfully submitted,

**HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.**

By: /s/ Nicole L. Hay

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**ATTORNEYS FOR MITEL LEASING,  
INC.**

**CERTIFICATE OF SERVICE**

This is to certify that on June 6, 2012, a true and correct copy of the above and foregoing *Notice of Appearance and Request for Notice and Papers* was served on all parties requesting electronic notification in this case.