

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-jw

Joint Administration Pending

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

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Daniel S. Bleck 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 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 or any related adversary proceeding 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

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); and Cliffs Club & Hospitality Service Company, LLC (9665).

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): [N/A. Opposing Counsel is aware of the proposed representation.]

No duty of consultation is required because the opposing party is proceeding pro se. [N/A]

Dated: February 29, 2012

Respectfully submitted,

McNAIR LAW FIRM, P.A.

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