

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

In re:

The Cliffs Club & Hospitality Group, Inc., *et al.*,<sup>1</sup>  
*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 OF  
WILLIAM L. ROTHSCHILD**

The undersigned local counsel hereby moves, in conjunction with the attached Application and Affidavit, that William L. Rothschild be admitted *pro hac vice* in the above-captioned cases 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

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<sup>1</sup> 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); 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):

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

Nexsen Pruet, LLC  
Firm Name

1230 Main Street, Suite 700  
Street Address or Post Office Box

Columbia, South Carolina 29201  
City, State, Zip Code

(803) 540-2026  
Telephone Number

Julio E. Mendoza, Jr.  
Name of Local Counsel

/s/ Julio E. Mendoza, Jr.  
Signature of Local Counsel

Local Counsel for Carlile Development Company, LLC; Steve and Penny Carlile; SP 50 Investments, Ltd.

Federal Bar Number 3365

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CHAPTER 11

Case No. 12-01220-jw

*Joint Administration Pending*

**APPLICATION/AFFIDAVIT FOR *PRO HAC VICE* ADMISSION**

1. Name. William L. Rothschild
  
2. Residence. I reside in the following state: Georgia  
If a South Carolina resident, indicate months/years of residence: \_\_\_\_\_
  
3. Business Address. I am an attorney and practice law under the name of or as a member of the following firm:
 

Firm name:	<u>Ogier, Rothschild, Rosenfeld &amp; Ellis-Monro, PC</u>
Mailing address:	<u>170 Mitchell Street, SW, Atlanta, GA 30303</u>
Telephone number:	<u>(404) 527-6644</u>
Facsimile number:	<u>(404)526-8855</u>
Email address:	<u>br@orrem.com</u>

(Application will not be considered without an e-mail address to receive electronic notification.)

4. Jurisdiction of this Court. I, William L. Rothschild, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction

<sup>1</sup> 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); Cliffs Club & Hospitality Service Company, LLC (9665).

of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>2</sup>

5. **Regular Practice of Law.** I am a member in good standing of the bar of the highest court of the District or the State of Georgia where I regularly practice law. **Attached is my certificate of good standing.**
6. **Additional Bar Membership.** I have been admitted to practice before the following Courts: (List all of the Courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and Courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing	
<u>Pls see Attachment 1</u>		<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____		<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____		<input type="checkbox"/> Yes	<input type="checkbox"/> No

7. **Pending Disciplinary Matters.** Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? NO .....  Yes  No

(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided in camera but that fact shall be revealed below.)

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8. **Curtailement of Prior Pro Hac Vice Admissions.** Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? NO .....  Yes  No

(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

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9. **Sanctions.** Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction? NO .....  Yes  No

(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

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<sup>2</sup> This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

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10. Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  Yes  No

NO

(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

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11. Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina? NO.  Yes  No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

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12. Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name:	<u>Julio E. Mendoza, Jr. (Federal I.D. No. 3365)</u>
Firm Name:	<u>Nexsen Pruet, LLC</u>
Street Address or Post Office Box:	<u>1230 Main Street, Suite 700</u>
City, State, and Zip Code:	<u>Columbia, South Carolina 29201</u>
Telephone Number:	<u>(803) 540-2026</u>
E-Mail Address:	<u>rmendoza@nexsenpruet.com</u>

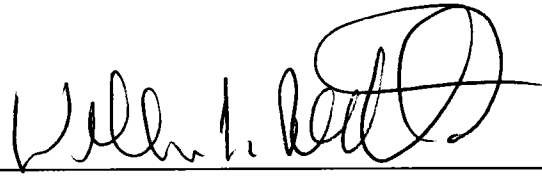
I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

13. Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

none

- 14. Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- 15. Electronic Notification. By submitting this application, I consent to electronic notification.
- 16. Represented Party/Parties. I seek to represent the following party/parties:

Carlile Development Company, LLC; Steve and Penny Carlile; the Carlile Group; SP 50 Investments, LTD



Signature of Applicant

Sworn to and subscribed before me

this 29 day of February, 2012.

Debra Lowe

A Notary Public of the State of Georgia

**DEBRA LOWE  
NOTARY PUBLIC, GWINNETT COUNTY, GEORGIA**

My Commission expires: MY COMMISSION EXPIRES APRIL 28, 2015

Attachment 1

<b>Court</b>	<b>Date Admitted</b>	<b>Good Standing</b>
Northern District of Georgia	October 7, 1974	Yes
Supreme Court of Georgia	January 8, 1975	Yes
Supreme Court of Ohio	1978	Yes; inactive
Eastern District of New York	1983	Yes*
Southern District of New York	1983	Yes*
Supreme Court of the State of New York Appellate Division: Second Judicial Department	1983	Resigned; see below**
Eleventh Circuit Court of Appeals	October 19, 1988	Yes
Middle District of Georgia	November 30, 2004	Yes
United States Supreme Court	October 6, 2008	Yes

\* I have not heard that I am not in good standing, but have not heard from them in a while, so I may have fallen off through unforwarded mail being returned.

\*\* I was permitted to resign from the Bar of the State of New York in 2011. I was in good standing at the time. There were no complaints of professional misconduct ever pending in any jurisdiction, nor had there ever been. In response to q. 9, "Set forth the reasons for this application for leave to resign from the Bar of the State of New York," I wrote, "I no longer practice up there."



Supreme Court  
State of Georgia  
STATE JUDICIAL BUILDING  
Atlanta 30334

CAROL W. HUNSTEIN, CHIEF JUSTICE  
GEORGE H. CARLEY, PRESIDING JUSTICE  
ROBERT BENHAM  
HUGH P. THOMPSON  
P. HARRIS HINES  
HAROLD D. MELTON  
DAVID E. NAHMIAS  
JUSTICES

THÉRÈSE S. BARNES, CLERK  
JEAN RUSKELL, REPORTER

February 29, 2012

I hereby certify that William Lee Rothschild, Esq., was admitted on the 8<sup>th</sup> day of January, 1975, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court  
hereto affixed the day and year first above written.

*Therese S Barnes*, Clerk