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

In Re:)	CHAPTER 11
)	
The Cliffs Club & Hospitality Group, Inc., <i>et al</i> ,)	CASE NO. 12-01220-JW
<i>d/b/a</i> The Cliffs Golf & Country Club,)	Jointly Administered
)	
Debtors.)	
)	

MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 3018(a)

Pursuant to the Court’s order approving disclosure statement and fixing time for filing acceptances or rejections of plan combined with notice thereof, Keowee Falls Investment Group, LLC (“KFIG”) respectfully moves pursuant to Bankruptcy Rule 3018(a) for an order temporarily allowing its claim numbers 1254 in the amount of \$450.00 and 1261 in the amount of \$16,669.860.00 for purposes of voting to accept or reject the Debtors’ Plan.

This Motion is in response to the Debtors’ Contested Matter filed July 12, 2012 seeking, among other things, to disallow KFIG’s above-stated unsecured claims.

KFIG respectfully denies that there is any valid reason to either disallow its claims or to deny it the right to vote to accept or reject the Debtors’ Plan.

Wherefore, KFIG respectfully requests the Court schedule a hearing on this matter, and for an order temporarily allowing its claims for voting purposes.

/s/ R. Geoffrey Levy
R. Geoffrey Levy
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July 16, 2012

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

In Re:) CHAPTER 11
)
The Cliffs Club & Hospitality Group, Inc., *et al*,) CASE NO. 12-01220-JW
d/b/a The Cliffs Golf & Country Club,) Jointly Administered
)
Debtors.) **CERTIFICATE OF SERVICE**
_____)

The undersigned hereby certifies that she is the Bankruptcy Paralegal for the attorney for Keowee Falls Investment Group, LLC, and that on July 16, 2012, she served the Motion for an Order Pursuant to Bankruptcy Rule 3018(a) by placing the same in the United States mail, postage prepaid, addressed to:

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