

**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

The Cliffs Club & Hospitality Group, Inc., *et al.*, d/b/a The Cliffs Golf & Country Club,

Movant,

v.

**The Cliffs at Glassy Inc. (Valley) - Claim No. 1251;
Keowee Investment Group, LLC - Claim No. 1252;
LaBastide Management Group, LLC - Claim No. 1253;
Keowee Falls Investment Group, LLC - Claim No. 1254;
The Cliffs at Keowee Springs, LLC - Claim No. 1255;
The Cliffs at Mountain Park, LLC - Claim No. 1258;
The Cliffs at Mountain Park, LLC - Claim No. 1259;
Keowee Falls Investment Group, LLC - Claim No. 1261;
The Cliffs at Mountain Park, LLC - Claim No. 1262;
The Cliffs at Keowee Springs, LLC - Claim No. 1263;
Cliffs Management Services, LLC - Claim No. 1268;
LaBastide Management Group, LLC - Claim No. 1270;
LaBastide Management Group, LLC - Claim No. 1271;
The Cliffs at Glassy Inc. (Valley) - Claim No. 1272;
Environmental Leasing, LLC - Claim No. 1273; and
Cliffs Management Services, LLC - Claim No. 1274;**

Respondents

CHAPTER 11

Case No. 12-01220

Jointly Administered

Contested Matter

¹ The Debtors, followed by the last four digits of their respective taxpayer identification numbers and Chapter 11 case numbers, are as follows: The Cliffs Club & Hospitality Group, Inc. (6338) (12-01220); CCHG Holdings, Inc. (1356) (12-01223); The Cliffs at Mountain Park Golf & Country Club, LLC (2842) (12-01225); The Cliffs at Keowee Vineyards Golf & Country Club, LLC (5319) (12-01226); The Cliffs at Walnut Cove Golf & Country Club, LLC (9879) (12-01227); The Cliffs at Keowee Falls Golf & Country Club, LLC (3230) (12-01229); The Cliffs at Keowee Springs Golf & Country Club, LLC (2898) (12-01230); The Cliffs at High Carolina Golf & Country Club, LLC (7576) (12-01231); The Cliffs at Glassy Golf & Country Club, LLC (6559) (12-01234); The Cliffs Valley Golf & Country Club, LLC (6486) (12-01236); and Cliffs Club & Hospitality Service Company, LLC (9665) (12-01237).

NOTICE OF DEPOSITION OF KEOWEE FALLS INVESTMENT GROUP, LLC

TO: R. Geoffrey Levy
Levy Law Firm, LLC
2300 Wayne Street
Columbia, SC 29201

NOTICE is hereby given that The Cliffs Club & Hospitality Group, Inc. et al. d/b/a The Cliffs Golf & Country Club, by and through its undersigned attorneys, McKenna Long & Aldridge LLP, shall take the deposition on oral examination of Keowee Falls Investment Group, LLC (the "Deponent") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, made applicable by Rule 7030 of the Federal Rules of Bankruptcy Procedure, made applicable by Rule 9014(c) of the Federal Rules of Bankruptcy Procedure, commencing on July 30, 2012 at 11:00 a.m. at the offices of Levy Law Firm, LLC, 2300 Wayne Street, Columbia, SC 29201. Said deposition shall be taken for the purposes of discovery, use at trial, and other purposes and uses authorized by the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure. The deposition will be conducted before a notary public or other person authorized to administer oaths, will be recorded by stenographic means, and will continue from day to day until completed, with such adjournments as to time and place as may be necessary.

Pursuant to Rule 30(b)(6), Deponent is requested to designate one or more officers, directors, managing agents, or other persons knowledgeable of the subject areas described in Exhibit A hereto upon which this deposition shall be taken, and who consent to testify on its behalf, and persons so designated shall testify as to matters known or reasonably available to Deponent.

Dated: July 18, 2012

Respectfully submitted,

/s/ Däna Wilkinson

Däna Wilkinson
District Court I.D. No. 4663
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365-C East Blackstock Road
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-and-

/s/ J. Michael Levengood

Gary W. Marsh
Georgia Bar No. 471290
J. Michael Levengood
Georgia Bar No. 447934
Bryan E. Bates
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MCKENNA LONG & ALDRIDGE LLP
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Attorneys for Debtors and Debtors in Possession

EXHIBIT "A" - AREAS UPON WHICH EXAMINATION IS TO BE TAKEN

1. The proofs of claim filed by Deponent, including without limitation, claim no. 1254 in the amount of \$450.00 and claim no. 1261 in the amount of \$16,669,860.00.
2. Any amounts owed by Deponent to the Debtors.
3. Any amounts owed by the Debtors to the Deponent.
4. The relationship between the Debtors and the Deponent.
5. The facts and issues raised by the Motion for an Order Pursuant to Bankruptcy Rule 3018(a).
6. The facts and issues raised by the Debtors' First Omnibus Objection to the Allowance of claim Nos. 1251, 1252, 1253, 1254, 1255, 1258, 1259, 1261, 1262, 1263, 1268, 1270, 1271, 1272, 1273 and 1274 filed by Cliffs Development Company Affiliates (the "Objection").
7. The intercompany payables and receivables between the Debtors and the Cliffs Development Company Affiliates (as defined in the Objection) and James B. Anthony.
8. The claims against one or more of the Debtors that were filed by the other respondents set forth in the caption of this Notice of Deposition.
9. The relationship between the Debtors and the Cliffs Development Company Affiliates (as defined in the Objection) and James B. Anthony.
10. Any documents evidencing the intercompany payables and receivables other than that attached to proofs of claim Nos. 1251, 1252, 1253, 1254, 1255, 1258, 1259, 1261, 1262, 1263, 1268, 1270, 1271, 1272, 1273 and 1274 filed by Cliffs Development Company Affiliates.
11. Any documents upon which the Deponent relies in support of its Motion for an Order Pursuant to Bankruptcy Rule 3018(a).

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing NOTICE OF DEPOSITION OF KEOWEE FALLS INVESTMENT GROUP, LLC by depositing in the United States Mail a copy of same to counsel of record for Keowee Falls Investment Group, LLC in a properly addressed envelope with adequate postage thereon, at:

R. Geoffrey Levy
Levy Law Firm, LLC
2300 Wayne Street
Columbia, SC 29201

Dated: July 18, 2012

Respectfully submitted,

/s/ Däna Wilkinson

Däna Wilkinson
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/s/ J. Michael Levensgood

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