

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

|  |   |                             |
|--|---|-----------------------------|
| <b>In re:</b>  | ) |                             |
|  | ) | <b>CHAPTER 11</b>           |
| <b>The Cliffs Club &amp; Hospitality Group, Inc.,</b>          | ) |                             |
| <i>et al.,<sup>1</sup> d/b/a The Cliffs Golf &amp; Country</i> | ) | <b>Case No. 12-01220</b>    |
| <b>Club,</b>   | ) |                             |
|  | ) | <b>Jointly Administered</b> |
|  | ) |                             |
| <b>Debtors.</b>  | ) |                             |
| <hr/>  | ) |                             |
| <b>The Cliffs Club &amp; Hospitality Group, Inc.,</b>          | ) |                             |
| <i>et al., d/b/a The Cliffs Golf &amp; Country Club,</i>       | ) |                             |
|  | ) |                             |
| <b>Movant,</b>   | ) |                             |
|  | ) |                             |
| <b>v.</b>  | ) | <b>Contested Matter</b>     |
|  | ) |                             |
| <b>Ben and Jo Ann Shanley, - Claim No. 996,</b>                | ) |                             |
|  | ) |                             |
| <b>Respondent.</b>   | ) |                             |
|  | ) |                             |
| <hr/>  | ) |                             |

**CERTIFICATE OF SERVICE RE:**

Docket No. 574      DEBTORS' OBJECTION TO THE ALLOWANCE OF CLAIM NO. 999 FILED BY BEN AND JO ANN SHANLEY

I, James H. Myers, state as follows:

1. I am over eighteen years of age and I believe the statements contained herein are true based on my personal knowledge. My business address is c/o BMC Group, Inc., 300 N. Continental Boulevard, Ste. 570, El Segundo, California 90245.

---


<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 (7576); The Cliffs at Glassy Golf & Country Club, LLC (6559); The Cliffs Valley Golf & Country Club, LLC (6486); Cliffs Club & Hospitality Service Company, LLC (9665).

2. On July 18, 2012, at the direction of McKenna Long & Aldridge LLP, counsel for the above-captioned Debtors and Debtors-in-Possession, the above referenced document was served on the parties listed in Exhibit A via the modes of service indicated thereon:

- Exhibit A Address List regarding Docket No. 574
- Those parties who have requested special notice, the Creditors Committee and the Core Group are referenced in Service Lists 48944 and 48945
  - The Affected Party is referenced in Service List 48949

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 23<sup>rd</sup> day of July 2012 at Paramount, California.



---

James H. Myers

**EXHIBIT A**

## Cliffs

Total number of parties: 63

### Exhibit A - Cliffs

| Svc Lst | Name and Address of Served Party   | Mode of Service     |
|---------|--|---------------------|
| 48944   | DANA WILKINSON, (RE: LOCAL COUNSEL TO DEBTORS), DANAWILKINSON@DANAWILKINSONLAW.COM   | E-mail              |
| 48944   | DANA WILKINSON, (RE: LOCAL COUNSEL TO DEBTORS), DANAWILKINSON@CHARTER.NET  | E-mail              |
| 48944   | JOHN B BUTLER III LOCAL COUNSEL, (RE: COUNSEL TO UNSECURED CREDITORS COMM), JBBIII@BELLSOUTH NET   | E-mail              |
| 48944   | BAKER DONELSON BEARMAN ET AL, E FRANKLIN CHILDRESS JR, (RE: WORTHINGTON HYDE PARTNERS-II LP), FCHILDRESS@BAKERDONELSON.COM                   | E-mail              |
| 48944   | BINGHAM MCCUTCHEN LLP, JONATHAN B ALTER LEAD COUNSEL, (RE: COUNSEL TO UNSECURED CREDITORS COMM), JONATHAN.ALTER@BINGHAM.COM                  | E-mail              |
| 48944   | BUCHALTER NEMER, PC, SHAWN M CHRISTIANSON ESQ, (RE: ORACLE AMERICA INC), SCHRIANSON@BUCHALTER.COM  | E-mail              |
| 48944   | CLAUER LAW FIRM LLC, GEORGE L CLAUER III, (RE: ELLIS W & JACQUELINE MCCRACKEN), GC_CLAUERLAW@BELLSOUTH NET                                   | E-mail              |
| 48944   | CLIFFS CLUB & HOSPITALITY GROUP,, TIMOTHY P. CHERRY, TCHERRY@CLIFFSCOMMUNITIES.COM   | E-mail              |
| 48944   | CLIFFS CLUB & HOSPITALITY GROUP, MARY CAMPBELL, MCAMPBELL@CLIFFSCOMMUNITIES.COM  | E-mail              |
| 48944   | COLE SCHOTZ MEISEL FORMAN & LEONARD, GARY H LEIBOWITZ ESQ, (RE: US FOODS INC), GLEIBOWITZ@COLESCHOTZ.COM                                     | E-mail              |
| 48945   | CRAWFORD & VON KELLER LLC, B. LINDSAY CRAWFORD III ESQ, (RE: RODOLFO & TANIA STERN), PO BOX 4216, COLUMBIA, SC, 29240                        | US Mail (1st Class) |
| 48944   | DRISCOLL SHEEDY PA, JAMES W SHEEDY / SUSAN E DRISCOLL, (RE: GE CAPITAL), JIMSHEDDY@DRISCOLLSHEEDY.COM  | E-mail              |
| 48944   | DRISCOLL SHEEDY PA, JAMES W SHEEDY / SUSAN E DRISCOLL, (RE: GE CAPITAL), SDRISCOLL@DRISCOLLSHEEDY.COM  | E-mail              |
| 48944   | FTI CONSULTING, INC , JIM GUGLIELMO, (RE: FA FOR WELLS FARGO), JIM.GUGLIELMO@FTICONCONSULTING.COM  | E-mail              |
| 48944   | FTI CONSULTING, INC , TIMOTHY DRAGELIN, (RE: FA FOR WELLS FARGO), TIMOTHY.DRAGELIN@FTICONCONSULTING.COM                                      | E-mail              |
| 48944   | GGG PARTNERS, LLC, JOE PEGNIA, (RE: CRO, FINANCIAL ADVISOR TO DEBTORS), JPEGNIA@GGGMGT.COM   | E-mail              |
| 48944   | GGG PARTNERS, LLC, KATIE S. GOODMAN, (RE: CRO, FINANCIAL ADVISOR TO DEBTORS), KGOODMAN@GGGMGT.COM  | E-mail              |
| 48944   | GGG PARTNERS, LLC, KATIE S. GOODMAN, (RE: CRO, FINANCIAL ADVISOR TO DEBTORS), KTGGOODMAN@MINDSPRING.COM                                      | E-mail              |
| 48944   | HAYNSWORTH SINKLER BOYD PA, LOUISE M JOHNSON ESQ, (RE: WILLIAM & ELAINE CLEAR), CJOHNSON@HSBLAWFIRM.COM                                      | E-mail              |
| 48944   | HAYNSWORTH SINKLER BOYD, P.A., TARA E NAUFUL, (RE: US FOODS INC), TNAUFUL@HSBLAWFIRM.COM   | E-mail              |
| 48944   | HIERSCHE HAYWARD DRAKELEY ET AL, RUSSELL W MILLS / NICOLE L HAY, (RE: MITEL LEASING INC), RMILLS@HHDULAW.COM                                 | E-mail              |
| 48944   | HIERSCHE HAYWARD DRAKELEY ET AL, RUSSELL W MILLS / NICOLE L HAY, (RE: MITEL LEASING INC), NHAY@HHDULAW.COM                                   | E-mail              |
| 48944   | HOLCOMBE BOMAR PA, A TODD DARWIN, (RE: MEDALIST GOLF INC), TDARWIN@HOLCOMBEBOMAR.COM   | E-mail              |
| 48944   | HOLCOMBE BOMAR PA, A TODD DARWIN, (RE: GEORGIA BRIDGE & DOCK), TDARWIN@HOLCOMBEBOMAR.COM   | E-mail              |
| 48944   | HOLCOMBE BOMAR PA, A TODD DARWIN, (RE: GOLF AGRONOMICS SAND & HAULING INC), TDARWIN@HOLCOMBEBOMAR.COM  | E-mail              |
| 48945   | IKON OFFICE SOLUTIONS, SEPRINA-RENEE THOMAS, RECOVERY & BANKRUPTCY GROUP, 3920 ARKWRIGHT RD; STE 400, MACON, GA, 31210                       | US Mail (1st Class) |
| 48945   | INTERNAL REVENUE SERVICE, CENTRALIZED INSOLVENCY OPERATION, 2970 MARKET ST, PHILADELPHIA, PA, 19104-5002                                     | US Mail (1st Class) |
| 48945   | INTERNAL REVENUE SERVICE, CENTRALIZED INSOLVENCY OPERATION, PO BOX 7346, PHILADELPHIA, PA, 19101-7346  | US Mail (1st Class) |
| 48945   | KENISON DUDLEY & CRAWFORD LLC, KEVEN KENISON, TOWNES B JOHNSON III, (RE: WALL TO WALL GOLF LLC ET AL), 704 E MCBEE ST, GREENVILLE, SC, 29601 | US Mail (1st Class) |

Cliffs

**Exhibit A - Cliffs**

| <b>Svc Lst</b> | <b>Name and Address of Served Party</b>  | <b>Mode of Service</b> |
|----------------|--|------------------------|
| 48945          | KENISON DUDLEY & CRAWFORD LLC, KEVEN KENISON, TOWNES B JOHNSON III, (RE: MORGAN CONCRETE CO), 704 E MCBEE ST, GREENVILLE, SC, 29601    | US Mail (1st Class)    |
| 48945          | KENISON DUDLEY & CRAWFORD LLC, T E DUDLEY III, T B JOHNSON III, (RE: RSL OF GREENVILLE LLC), 704 E MCBEE ST, GREENVILLE, SC, 29601     | US Mail (1st Class)    |
| 48945          | KENISON DUDLEY & CRAWFORD LLC, T E DUDLEY III, T B JOHNSON III, (RE: KEVIN & COURTNEY MCCARTHY), 704 E MCBEE ST, GREENVILLE, SC, 29601 | US Mail (1st Class)    |
| 48944          | LAW OFFICE OF NANCY E JOHNSON LLC, NANCY E JOHNSON, (RE: NEWLIFE TURF INC), NEJ@NJOHNSON-BANKRUPTCY.COM                                | E-mail                 |
| 48944          | LEVY LAW FIRM LLC, R GEOFFREY LEVY, (RE: KEOWEE FALLS INVESTMENT GROUP LLC), GLEVY@LEVYLAWFIRM.ORG                                     | E-mail                 |
| 48945          | MCALIEER PENNINGTON LAW FIRM LLC, MALINDA MCALIEER PENNINGTON, (RE: HAWKINS NURSERY INC), 7 ALTAMONT CT, GREENVILLE, SC, 29609         | US Mail (1st Class)    |
| 48944          | MCKENNA LONG & ALDRIDGE LLP, BRYAN E BATES, (RE: COUNSEL TO DEBTORS), BBATES@MCKENNALONG.COM   | E-mail                 |
| 48944          | MCKENNA LONG & ALDRIDGE LLP, GARY W MARSH, (RE: COUNSEL TO DEBTORS), GMARSH@MCKENNALONG.COM  | E-mail                 |
| 48944          | MCKENNA LONG & ALDRIDGE LLP, J MICHAEL LEVENGOOD, (RE: COUNSEL TO DEBTORS), MLEVENGOOD@MCKENNALONG.COM                                 | E-mail                 |
| 48944          | MCNAIR LAW FIRM PA, ELIZABETH (LISA) J PHILP, (RE: WELLS FARGO BANK NA), LPHILP@MCNAIR.NET   | E-mail                 |
| 48944          | MCNAIR LAW FIRM PA, MICHAEL M BEAL, (RE: WELLS FARGO BANK NA), MBEAL@MCNAIR.NET  | E-mail                 |
| 48944          | MINTZ LEVIN COHN ET AL, DANIEL S BLECK / CHARLES W AZANO, (RE: WELLS FARGO BANK NA), DSBLECK@MINTZ.COM                                 | E-mail                 |
| 48944          | MINTZ LEVIN COHN ET AL, DANIEL S BLECK / CHARLES W AZANO, (RE: WELLS FARGO BANK NA), CWAZANO@MINTZ.COM                                 | E-mail                 |
| 48944          | MINTZ LEVIN COHN ET AL, JACKIE CANNATA, (RE: WELLS FARGO BANK NA), JACANNATA@MINTZ.COM   | E-mail                 |
| 48944          | MOORE & VAN ALLEN PLLC, ROBERT A KERR JR ESQ, (RE: DEERE CREDIT INC), ROBERTKERR@MVALAW.COM  | E-mail                 |
| 48944          | MOORE TAYLOR & THOMAS PA, JANE H DOWNEY, (RE: WILLIAM A & FLONNIE B SHAW), JANE@MTTLAW.COM   | E-mail                 |
| 48944          | NEXSEN PRUET LLC, JULIO E MENDOZA JR ESQ, (RE: CARLILE DEV CO / SP 50 INVESTMENTS), RMENDOZA@NEXSENPRUET.COM                           | E-mail                 |
| 48944          | NEXSEN PRUET, ED MENZIE, (RE: COUNSEL FOR THE DIP LENDER), EMENZIE@NEXSENPRUET.COM   | E-mail                 |
| 48944          | OFFICE OF THE UNITED STATES TRUSTEE, LINDA BARR, LINDA K BARR@USDOJ.GOV  | E-mail                 |
| 48944          | OGIER, ROTHSCHILD, ROSENFELD &, WILLIAM L. ROTHSCHILD, (RE: COUNSEL FOR THE DIP LENDER), BR@ORREM.COM                                  | E-mail                 |
| 48944          | PLATZER SWERGOLD KARLIN LEVIN ET AL, RALPH R HOCHBERG ESQ, (RE: JUNG YOON), RHOCHBERG@PLATZERLAW.COM                                   | E-mail                 |
| 48944          | POYNER SPRUILL LLP, DIANE P FURR / TATE L OGBURN, (RE: TCF EQUIPMENT FINANCE INC), DFURR@POYNER.COM                                    | E-mail                 |
| 48944          | REED SMITH LLP, RIZWAN A QURESHI ESQ, (RE: GE CAPITAL), RQURESHI@REEDSMITH.COM   | E-mail                 |
| 48945          | RICOH AMERICAS CORPORATION, JENNIFER ORENSTEIN, ATTN: BANKRUPTCY, 3920 ARKWRIGHT RD; SUITE 400, MACON, GA, 31210                       | US Mail (1st Class)    |
| 48945          | SECURITIES AND EXCHANGE COMMISSION, 100 F STREET, NE, WASHINGTON, DC, 20549  | US Mail (1st Class)    |
| 48945          | SECURITIES AND EXCHANGE COMMISSION, 233 BROADWAY, NEW YORK, NY, 10279  | US Mail (1st Class)    |
| 48945          | SECURITIES AND EXCHANGE COMMISSION, 15TH & PENNSYLVANIA AVE., NW, WASHINGTON, DC, 20020  | US Mail (1st Class)    |
| 48945          | SECURITIES AND EXCHANGE COMMISSION, OFFICE OF REORGANIZATION, 950 EAST PACES FERRY ROAD #900, ATLANTA, GA, 30326-1382                  | US Mail (1st Class)    |
| 48949          | SHANLEY, BEN & JO ANN, 2055 SUGARLOAF CLUB DR, DULUTH, GA, 30097   | US Mail (1st Class)    |
| 48944          | SMITH JORDAN LAVERY & LEE PA, JES STERLING, (RE: DR DANIEL MCCOLLUM), STERLING@SMITHJORDAN.COM   | E-mail                 |
| 48944          | SMITH MOORE LEATHERWOOD LLP, M KEVIN MCCARRELL, (RE: HELENA CHEMICAL COMPANY), KEVIN MCCARRELL@SMITHMOORELAW.COM                       | E-mail                 |
| 48944          | TOBIAS G WARD JR PA, TOBIAS G WARD JR, (RE: WORTHINGTON HYDE PARTNERS-II LP), TW@TOBYWARDLAW.COM                                       | E-mail                 |
| 48945          | UNITED STATES ATTORNEY'S OFFICE, DISTRICT OF SOUTH CAROLINA, 1441 MAIN ST #500, COLUMBIA, SC, 29201                                    | US Mail (1st Class)    |
| 48944          | WELLS FARGO CORPORATE TRUST SERVICE, MICHAEL G SLADE, (RE: WELLS FARGO, N A AS INDENTURE TTEE), MICHAEL.G.SLADE@WELLSFARGO.COM         | E-mail                 |

**Exhibit A - Cliffs**

**Svc Lst Name and Address of Served Party**

**Mode of Service**

---

**Subtotal for this group: 63**