

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re:)	Chapter 11
)	
The Cliffs Club & Hospitality Group,)	Case No: 12-01220
Inc., et al., d/b/a The Cliffs Golf &)	
Country Club, ¹)	
)	
)	
Debtors.)	

MOTION IN SUPPORT OF PRO HAC VICE APPLICATION

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Patrick W. Carothers 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 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
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.

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).

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):
- Beth L. Slaby, Esq. of Thorp Reed Armstrong left a voicemail for Opposing Counsel, Gary Marsh, on August 3, 2012 to determine if he would oppose / not oppose the Motion. However, as of the time of this filing, Mr. Marsh has not yet responded.
- No duty of consultation is required because the opposing party is proceeding pro se.

Law Office of Sidney Wike, LLC
Firm Name

311 Pettigru Street
Street Address or P.O. Box
Greenville, SC 29601
City, State, Zip Code
(864) 239-0007
Telephone Number
Sidney@sidneywike.com

Sidney Wike
Name of Local Counsel

/s/ Sidney Wike No. 6729
Signature of Local Counsel
Local Counsel for Bruce Cassidy, Jr.

District of South Carolina

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re:) CHAPTER 11
)
The Cliffs Club & Hospitality Group, Inc., et) Case No. 12-01220
al.,¹ d/b/a The Cliffs Golf & Country Club,)
) Application/Affidavit for
Debtors.) Pro Hac Vice Admission
)

(1) Name. Patrick W. Carothers
First Middle Last

(2) Residence. I reside in the following state:
If a South Carolina resident, indicate months/years of residence: Pennsylvania

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Thorp Reed & Armstrong, LLP
Mailing address: 301 Grant Street, 14th Floor, Pittsburgh, PA 15219-1425
Telephone number: (412) 394-2325
Facsimile number: (412) 394-2555
E-mail address: pcarothers@thorpreed.com

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

(4) Jurisdiction of this Court. I, 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 of the United States District Court for the District of South Carolina in all matters of attorney conduct.²

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the Commonwealth of Pennsylvania where I regularly practice law. Attached is my certificate of good standing.

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).

²This District 1 maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

(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

<u>State of Ohio</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Western District of Pennsylvania</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Eastern District of Pennsylvania</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Northern District of Ohio</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Southern District of Ohio</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Eastern District of Michigan</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the Western District of Michigan</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<u>United States District Court for the District of Maryland</u>	<input checked="" 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? 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.)

(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?
 Yes No
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

(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?
 Yes No
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

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

(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?

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.

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

Attorney Name: Sidney Wike
Firm Name: Law Office of Sidney Wike, LLC
Street Address or Post Office Box: 311 Pettigru Street
City, State, and Zip Code: Greenville, SC
Telephone Number: (864) 239-0007
E-Mail Address: Sidney@sidneywike.com

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.

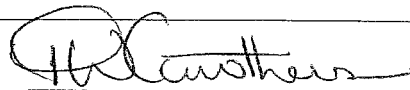
J. Alexander Hershey, Thorp Reed & Armstrong, LLP

(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.

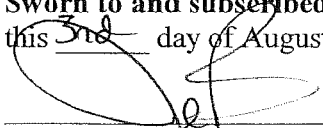
(16) Represented Party/Parties. I seek to represent the following party/parties:

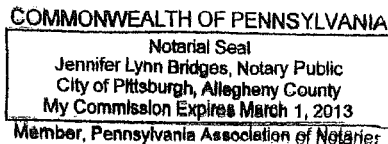
Bruce Cassidy, Jr.



Signature of Applicant

Sworn to and subscribed before me this 3rd day of August, 2012.


A Notary Public
of the Commonwealth of Pennsylvania



My Commission expires: March 1, 2013



Supreme Court of Pennsylvania

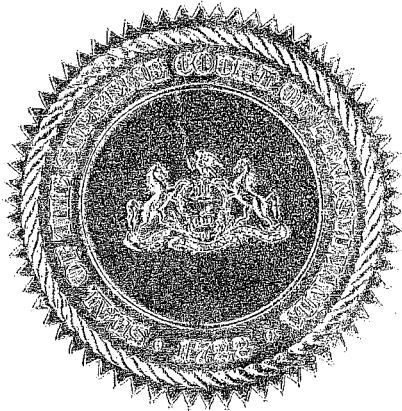
CERTIFICATE OF GOOD STANDING

Patrick William Carothers, Esq.

DATE OF ADMISSION

October 18, 2000

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 2, 2012

A handwritten signature in cursive script, reading "Patricia A. Nicola".

Patricia A. Nicola
Chief Clerk