

**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.

CHAPTER 11

Case No. 12-01220-jw

Joint Administration

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and the Notice of Occurrence of Effective Date of Chapter 11 Plan; Limitation of Notice; and Related Matters filed on August 31, 2012 [Dkt. No. 691] (the “Notice”), McNair Law Firm, P.A. (“McNair”) and Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (“Mintz Levin”) hereby enter their appearance on behalf of Wells Fargo Bank, National Association, in its capacity as indenture trustee (the “Indenture Trustee”), a creditor(s) and/or party in interest in the above captioned cases, which among other capacities is the Indenture Trustee for the holders of the Series A Notes due 2017 and Series B Notes due 2017 issued pursuant to that certain Indenture dated April 30, 2010, as amended by the Plan (as defined below) and related documents; and it is hereby further requested, in accordance with the Notice, that all notices given or required to be given and all pleadings and papers served or required to be served in the above-captioned cases and/or pursuant to the First Amended and

¹ 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); and Cliffs Club & Hospitality Service Company, LLC (9665).

Restated Joint Chapter 11 Plan dated June 30, 2012, as amended (the "Plan") be served upon the Indenture Trustee and counsel to the Indenture Trustee at the following addresses:

Indenture Trustee:

Michael G. Slade
Wells Fargo Corporate Trust Service
MAC #N9311-115
625 Marquette Avenue, 11th Floor
Minneapolis, MN 55479
Fax: 612-667-1984
Email: Michael.G.Slade@wellsfargo.com

Counsel to the Indenture Trustee:

McNair and Mintz Levin: See addresses below

and that the Indenture Trustee and its above counsel be added to the general mailing matrix, any shortened mailing matrix or any service lists, whether maintained by the Debtors and/or the Liquidating Trustee (as defined in the Plan).

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleadings, claim, or suit shall waive (1) the right of the Indenture Trustee to have final orders in non-core matters entered only after *de novo* review by the District Court, (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right of the Indenture Trustee to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Indenture Trustee is or may be entitled to under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, or recoupments the Indenture Trustee expressly reserves, along with all others applicable.

[CONTINUED ON NEXT PAGE]

Nothing herein or in any other pleading from the Indenture Trustee shall constitute or be construed to be a waiver of any of the Indenture Trustee's rights or remedies.

Dated: September 4, 2012

McNAIR LAW FIRM, P.A.

/s/ Elizabeth (Lisa) J. Philp
Elizabeth (Lisa) J. Philp (S.C. Dist. Ct. ID # 8033)
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- and -

Daniel S. Bleck (admitted *pro hac vice*)
Charles W. Azano (admitted *pro hac vice*)
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*Counsel for Wells Fargo Bank, National Association, the
Indenture Trustee*

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CERTIFICATE OF SERVICE

I, Ashley S. Stokes, an employee of the McNair Law Firm, P.A., hereby certify that on September 4, 2012 the foregoing document, **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**, was served by First Class Mail, postage prepaid on the parties listed below:

Däna Wilkinson
LAW OFFICE OF DÄNA WILKINSON
365-C East Blackstock Road
Spartanburg, SC 29301

Gary W. Marsh
J. Michael Levengood
Bryan E. Bates
MCKENNA LONG & ALDRIDGE LLP
303 Peachtree Street, Suite 5300
Atlanta, Georgia 30308

Katie Goodman, Liquidation Trustee
GGG Partners LLC
5883 Glenridge Drive, Suite 160
Atlanta, GA 30328

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McNAIR LAW FIRM, P.A.



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Columbia, South Carolina
September 4, 2012