

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

IN RE: BRD LAND & INVESTMENT, et al. <p style="text-align: center;">Debtors.¹</p>	Chapter 11 Case No. 26-30215 (Jointly Administered)
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**EX PARTE APPLICATION FOR ORDER APPROVING THE RETENTION AND
EMPLOYMENT OF GREERWALKER LLP AS CONSULTANTS, TAX AND
FINANCIAL ADVISORS TO THE DEBTORS AND THEREBY DESIGNATE
WILLIAM A. BARBEE AS CHIEF RESTRUCTURING OFFICER OF THE DEBTORS
AS OF THE PETITION DATE**

BRD Land & Investment, a South Carolina partnership, BRDL Warden Station Holding Co LLC, and BRDL Warden Station, LLC (collectively, the “Debtors”), as debtors and debtors-in-possession in the above-captioned case, hereby make this application (the “Application”) to the Court for entry of an order under sections 327, 328, 330, and 331 of title 11 of the United States Code, (the “Bankruptcy Code”), authorizing the employment and retention of GreerWalker LLP (“GreerWalker”) as consultants and financial advisors to the Debtors, and confirm the designation of William A. Barbee (“Barbee”), a Partner of Litigation and Forensic Services at GreerWalker, as Chief Restructuring Officer (“CRO”), as of the date of the filing of the bankruptcy petitions. In support of this Application, the Debtors respectfully state as follows:

¹ The Debtors in these jointly administered cases are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): BRD Land & Investment, a South Carolina partnership (6940), BRDL Warden Station Holding Co LLC (0184), and BRDL Warden Station, LLC (4687). The Debtors’ address is 6433 Bannington Road, Charlotte, NC 28226.



Introduction

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On February 24, 2026 (the “Petition Date”), the Debtors commenced their reorganization cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are authorized to continue to manage their property and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. The statutory bases for the relief requested in this Application are sections 327, 328, 330, and 331 of the Bankruptcy Code and Rules 2014(a) and 2016(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Relief Requested

4. By this Application, the Debtors seek to employ and retain GreerWalker pursuant to sections 327, 328, 330, and 331 of the Bankruptcy Code to perform consulting, tax and financial advisory services, described with greater particularity below, for the Debtors in these Chapter 11 Cases, effective as of the Petition Date.

5. The Debtors are familiar with the professional standing and reputation of GreerWalker. The Debtors understand that GreerWalker has a wealth of experience in providing consulting, tax and financial advisory services in restructurings and reorganizations and enjoys an excellent reputation for services it has rendered in Chapter 11 cases on behalf of debtors and creditors in this District.

6. On February 12, 2026, GreerWalker was engaged to provide consulting, tax and financial advisory services to the Debtors. More specifically, on February 23, 2026, each of the Debtors approved the appointment of Barbee as CRO of the Debtors. Barbee still holds that position as of the Petition Date. Because of GreerWalker's professional relationship with the Debtors, GreerWalker has developed a great deal of institutional knowledge regarding the Debtors' operations, finances and systems. Such experience and knowledge will be valuable to the Debtors in their efforts during these Chapter 11 cases, and will enable GreerWalker to provide consulting, tax, and financial advisory services to the Debtors in an efficient and effective manner. Accordingly, the Debtors wish to retain GreerWalker to provide consulting, tax and financial advisory services during these Chapter 11 Cases.

Scope of Services

7. GreerWalker will provide to the Debtors the mutually agreed upon services described below with respect to the Debtors' Chapter 11 Cases. Below is a list of general services GreerWalker will provide hereunder as requested by the Debtors and as agreed to by GreerWalker:

- i. Provide assistance to Debtors and Debtors' counsel with Court filings as needed;
- ii. Directly manage the Debtors' financial matters;
- iii. Provide expert testimony before the Bankruptcy Court as required;
- iv. Provide post-petition bankruptcy consulting services as required;
- v. Assist in post-petition financial restructuring and plan of reorganization formulation; and
- vi. Other consulting and tax services as may be required and other customary and typical duties for a CRO.

GreerWalker's Disinterestedness

8. GreerWalker has informed the Debtors that, except as may be set forth in the Affidavit of William A. Barbee (the "Barbee Affidavit"), attached hereto as Exhibit A, it (i) has no connection with the Debtors, its creditors, or other parties in interest in the Chapter 11 Cases; (ii) does not hold any interest adverse to the Debtors' estate; and (iii) believes it is "disinterested" as defined within section 101(14) of the Bankruptcy Code.

9. GreerWalker will conduct an ongoing review of its files to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new facts or circumstances are discovered, GreerWalker will supplement its disclosure to the Court.

10. Neither GreerWalker nor any of its members hold any equity interest in the Debtors.

11. Other than with its own partners and employees, GreerWalker has agreed not to share with any person or firm the compensation to be paid for professional services rendered in connection with this case.

12. Based upon the foregoing, the Debtors believe that GreerWalker is "disinterested" as that term is defined in section 101(14) of the Bankruptcy Code and that GreerWalker is eligible for employment by the Debtors pursuant to section 327 of the Bankruptcy Code and applicable Bankruptcy Rules.

Terms of Retention

13. The Debtors understand that GreerWalker intends to apply to the Court for allowances of compensation and reimbursement of expenses for all CRO-related consulting, tax and financial advisory support services in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, corresponding local rules, orders of this Court, and

guidelines established by the United States Bankruptcy Administrator for the Western District of North Carolina. The customary hourly rates, subject to periodic adjustments, charged by GreerWalker range from \$165 to \$690 per hour. GreerWalker's fees for Barbee's services as CRO will be billed at \$590 per hour. Barbee will maintain overall responsibility for the engagement on behalf of GreerWalker. Technical support may also be provided by other professionals who may be identified during the course of the engagement. In accordance with the normal billing practices of GreerWalker, these hourly billing rates remain in effect for 2026 and will be reviewed and revised as necessary as of January 1 of each year. In addition to the compensation set forth above, the Debtors shall pay directly or reimburse GreerWalker upon receipt of periodic billings for all out-of-pocket expenses, such as postage, overnight delivery, working meals, travel expenses, computer research, and other expenses, at cost or based on formulae that approximate the actual cost where the actual cost is not easily ascertainable

14. GreerWalker received a \$40,000 prepetition payment from the Debtors. This retainer was paid in anticipation of the work GreerWalker would undertake in preparation for filing the Debtors' Chapter 11 Cases. The actual time and expenses incurred by GreerWalker in this engagement on a prepetition basis totaled \$33,473. While not required to do so, GreerWalker will apply the balance of the pre-bankruptcy retainer payment to post-petition fees and expenses as approved by the Bankruptcy Court.

15. Attached hereto as Exhibit B is a proposed Order approving the engagement of GreerWalker.

Notice

16. No trustee, examiner, or creditors' committee has been appointed in these Chapter 11 Cases. The Debtors have served notice of this motion on the parties listed on the Certificate of Service filed in connection with this matter, and submit that, given the nature of the relief

requested, no other of further notice need be given. No previous application for the relief requested herein has been made by the Debtors to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court:

- A. Enter an Order, substantially in the form attached hereto as Exhibit B, authorizing the Debtors to employ and retain GreerWalker as consultants and financial advisors, including, without limitation, provision of services as CRO for the Debtors for the purposes set forth above, as of the Petition Date; and
- B. Grant such further relief as is just and proper.

This the 10th day of March, 2026.

BRD LAND & INVESTMENT, a South Carolina partnership

Signed by:
 By: Lindsay Jarvis
0253D31892A04E7...
 Lindsay Jarvis
 Authorized Officer

BRDL WARDEN STATION HOLDING CO LLC

Signed by:
 By: Lindsay Jarvis
0253D31892A04E7...
 Lindsay Jarvis
 Authorized Officer

BRDL WARDEN STATION, LLC

Signed by:
 By: Lindsay Jarvis
0253D31892A04E7...
 Lindsay Jarvis
 Authorized Officer

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA

In re:	Chapter 11
BRD Land & Investment, et al.	Case No.: 26-
Debtor.	

AFFIDAVIT OF WILLIAM A. BARBEE

WILLIAM A. BARBEE, being duly sworn, deposes and says:

1. I am a Partner of Litigation and Forensic Services of GreerWalker LLP (hereinafter “Firm”), a certified public accounting firm with offices at 227 West Trade Street, Suite 1100; Charlotte, NC 28202.

2. I submit this Affidavit in connection with the Application of the Debtor in this Chapter 11 case for entry of an order pursuant to sections 327 of Chapter 11, title 11 of the United States Code (11 U.S.C. §§ 101 et seq.) (the “Bankruptcy Code”) and Rules 2014(a) and 2016(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) authorizing the employment and retention of Firm, at its normal hourly rates in effect from time to time and in accordance with its normal reimbursement policies, as financial advisor for the Debtor (the “Application”)¹ effective February 12, 2026, the date the Firm was retained by the Debtor.

3. I also submit this Affidavit to provide disclosure required under Rules 2014(a) and 2016(b) of the Bankruptcy Rules.

¹Capitalized terms otherwise not defined herein shall have the meanings ascribed to them in the Application.

4. Unless otherwise stated in this Affidavit, I have personal knowledge of the facts set forth herein. To the extent any information disclosed herein requires amendment or modification upon Firm completion of further review or as additional information becomes available to it, a supplemental Affidavit will be submitted to the Court reflecting such amended or modified information.

5. Neither except as set forth herein, to the best of my knowledge, after due inquiry, Firm, any shareholder or associate of the Firm nor do I represent any party in interest other than the Debtor in this Chapter 11 case.

Firm Disclosure Procedures

6. In preparing this Affidavit, I used a set of procedures developed by the Firm to ensure compliance with the requirements of the Bankruptcy Code and the Bankruptcy Rules regarding the retention of professionals by a Debtor or Committee under the Bankruptcy Code (the "Firm Disclosure Procedures"). Pursuant to the Firm Disclosure Procedures, I performed, or caused to be performed, the following actions to identify the parties relevant to this Affidavit and to ascertain Firm connection to such parties:

- a. A list was prepared consisting of the Debtor, Related Entities, Debtor Counsel, Secured Creditors, and Top 20 Creditors (the "Parties in Interest"); and
- b. Firm requires all of its Partners, before accepting the representation of a new client, or the representation of an existing client in a new matter, to perform a conflicts check. In this case, an electronic mail was distributed to the Firm Partners and members of the Forensic & Valuation Services Group, to confirm positively or negatively any connections that they may have had with the Parties in Interest

referenced above. Moreover, a search has been performed of Firm's electronic client database of all current engagements to identify additional connections.

Firm's Connections with Parties in Interest in Matters Unrelated to this Chapter 11 Case

7. Any client connections with regard to which Firm had represented the client were reviewed by me and from such review it was determined that, in respect of each connection between Firm and such parties, Firm does not hold or represent an interest that is adverse to the estate and that Firm is a "disinterested person" as such term defined in section 101(14) of the Bankruptcy Code for the reasons discussed below.

8. The following lists are the product of implementing the Firm Disclosure Procedures described in the above paragraph 9 and are based on the relationship of the indicated entities with the Debtor, arranged under the following categories: (a) the Debtor, (b) present and former officers and directors of the Debtor and their related entities, (c) professionals representing the Debtor, (d) financial creditors of the Debtor, (e) significant vendors and utilities of the Debtor and plaintiffs in litigation against the Debtor, (f) professionals representing other parties in interest, (g) entities related by common ownership, and (h) the Bankruptcy Court and the Bankruptcy Administrator for the Western District of North Carolina.

- a. Debtor. Firm has provided Tax, Intacct Software Services and Bankruptcy Consulting to the Debtor. As of the date of the petition, Firm was owed \$6,500 for Intacct Software Services and has agreed to write off that receivable. Firm received a \$40,000 true retainer from the Debtor on February 17, 2026 in anticipation of work in preparation for this Bankruptcy Filing. The actual time and expenses incurred by the Firm in this engagement on a prepetition basis totaled \$33,576. Prior to the bankruptcy filing, the Debtor paid \$11,500 in retainers for Tax

and Client Accounting Services on February 20, 2026. Actual time for tax consulting work performed pre-petition for tax consulting totaling \$3,015 was billed and applied to the retainer. Intacct Accounting Software usage expenses going forward will be billed monthly. Firm will apply the balance of the pre-bankruptcy retainer payment to post-petition fees and expenses as approved by the Bankruptcy Court.

- b. Debtors Partners and related entities. The Firm has a client relationship with CCF Investment Holdings I, Lindsay Jarvis, Burrell, V&T Realty LLC, Tim Samuels, and CCF Investment Holdings II, LLC, who are all equity owners of the Debtor. However, the Firm does not and will not represent such clients in any way related to the Debtor's bankruptcy case.
- c. Professionals Representing the Debtor. As part of its practice, Firm consults in cases, proceedings and transactions involving many different attorneys, accountants, financial consultants, real estate consultants and investment bankers, including the professionals representing the Debtor.
- d. Financial Creditors. The Firm had a previous client relationship with Rockstar Capital Development and Rockstar Land Invest, LLC, however the Firm is no longer engaged by Rockstar Capital Development, Rockstar Land Invest, LLC, or any other Financial Creditor of the Debtor.
- e. Significant Vendors and Utilities and Plaintiffs/Defendants in Litigation. Firm has never been engaged by any utility, or plaintiff/defendant in Litigation.
- f. Professional Representing Other Parties in Interest. Firm prepares income tax returns for many individuals and entities which includes law firms and partners

within many law firms and may include partners within the law firms involved in this bankruptcy case. As part of its practice, Firm appears in cases, proceedings and transactions involving many different attorneys, accountants, financial consultants and investment bankers, some of whom now or may in the future represent creditors, stockholders and other parties in interest in this case. Firm does not and will not represent any attorneys, accountants, financial consultants, investment bankers or parties in interest in relation to the Debtor and this Chapter 11 case or have any relationship with any such professionals that would be adverse to the Debtor or its estate. Firm, in unrelated matters, has been and continues to be involved in bankruptcy and/or litigation cases and transactions involving law firms involved in this case, including counsel for the Debtor.

- g. Entities Related to the Debtor by Common Ownership. The Firm has a client relationship with Estero, LLC and Buller River Developments, LLC which are entities related to the Debtor by common ownership. However, the Firm does not and will not represent such clients in any way related to the Debtor's bankruptcy case.
- h. The Bankruptcy Court and the Bankruptcy Administrator. Firm appears regularly in the United States Bankruptcy Court for the Western District of North Carolina.

Firm's Rates and Billing Practice

9. The terms of the employment of Firm are subject to the approval of the Court, and the Firm will provide services to the Debtor at their regular hourly rates which range from \$165 to \$690 per hour. The hourly rates for the consultants who will be primarily involved in this matter are as follows: \$590.00 per hour for William A. Barbee.

10. Firm disbursement policies pass through all out of pocket expenses at actual cost. These expenses include postage, overnight delivery, working meals, travel expenses, computer research and other expenses.

11. No promises have been received by Firm or any shareholder or associate thereof as to payment or compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. Firm has no agreement with any other entity to share such payment or compensation received by Firm or any other entity.

12. The Application requests, pursuant to Bankruptcy Code sections 328 and 1103, approval of the Debtor's retention of Firm on rates, terms and conditions consistent with what Firm charges its non-Chapter 11 clients, namely, prompt payment of its hourly rates as adjusted from time to time and reimbursement of out-of-pocket disbursements at cost or based on formulae that approximate the actual cost where the actual cost is not easily ascertainable. Subject to these terms and conditions, Firm intends to apply for compensation for professional services rendered in this Chapter 11 case and for reimbursement of actual and necessary expenses incurred in connection therewith.

13. The foregoing constitutes the statement of Firm pursuant to sections 327 of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016(b).



William A. Barbee
GreerWalker LLP
227 W. Trade Street, Suite 1100
Charlotte, NC 28202

Mecklenburg County, North Carolina

Signed and sworn to before me this day by William A. Barbee.

Date: 03/10/2026

(SEAL)



Sandra Compton, Notary Public
My commission expires: 09/16/2030

Sandra Raye Compton
NOTARY PUBLIC
Union County, NC
My Commission Expires September 16, 2030

EXHIBIT B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

IN RE:

BRD LAND & INVESTMENT, et al.

Debtors.¹

Chapter 11

Case No. 26-30215

(Joint Administration Requested)²

**EX PARTE ORDER APPROVING THE RETENTION AND EMPLOYMENT OF
GREERWALKER LLP AS CONSULTANTS AND FINANCIAL ADVISORS TO THE
DEBTORS AND THEREBY DESIGNATE WILLIAM A. BARBEE AS CHIEF
RESTRUCTURING OFFICER OF THE DEBTORS AS OF THE PETITION DATE**

Upon the application (the “Application”) of BRD Land & Investment, a South Carolina partnership, BRDL Warden Station Holding Co LLC, and BRDL Warden Station, LLC (collectively, the “Debtors”), as debtors and debtors-in-possession in the above-captioned case, for entry of an order, pursuant to section 327 of title 11 of the United States Code (the “Bankruptcy Code”) and Local Rules 2014-1, 2016-1(b), and 9013-1(f) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”), authorizing the employment and retention of GreerWalker LLP (“GreerWalker”) as

¹ The Debtors in these jointly administered cases are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): BRD Land & Investment, a South Carolina partnership (6940), BRDL Warden Station Holding Co LLC (0184), and BRDL Warden Station, LLC (4687). The Debtors’ address is 6433 Bannington Road, Charlotte, NC 28226.

² The Debtors have filed a motion requesting joint administration of their respective Chapter 11 bankruptcy cases.

consultants and financial advisors to the Debtors, thereby designating William A. Barbee (“Barbee”), as chief restructuring officer of the Debtors, in accordance with the terms set forth in the Application and the Affidavit of William A. Barbee (the “Barbee Affidavit”), which is attached to the Application as Exhibit A; and the Court being satisfied, based upon the representations made in the Application and the Barbee Affidavit, that neither GreerWalker nor Barbee holds any interest adverse to the Debtors or their estates as to the matters upon which GreerWalker and Barbee are to be engaged and that GreerWalker and Barbee are disinterested under the meaning of section 101(14) of the Bankruptcy Code; and that the employment of GreerWalker and Barbee is necessary and would be in the best interests of the Debtors and the Debtors’ estates; and it appearing that the Court has jurisdiction to consider the Application; and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. The Debtors are authorized to retain GreerWalker as consultants, tax and financial advisors pursuant to the terms set forth in the Application.
3. The Debtors are authorized to retain Barbee as their Chief Restructuring Officer pursuant to the terms set forth in the Application.
4. The compensation to be paid to GreerWalker and Barbee for professional services rendered and reimbursement for expenses incurred by it shall be as determined by this Court upon proper application under the Bankruptcy Code and such other procedures as may be fixed by order of this Court.

5. Pursuant to Rule 9013-1(f) of the Local Rules, any party shall be entitled to request a hearing or request that the Court reconsider entry of this Order by filing a Motion for Reconsideration within fourteen (14) days of service of this Order.

This Order has been signed electronically. The judge's signature and court's seal appear at the top of the Order.

United States Bankruptcy Court