

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

In re:

BRD Land & Investment,

Debtors.

Case No. 26-30215

Chapter 11

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned counsel for Land Investment Resources LLC (“LIR”), hereby enters their appearance and requests that notice of all papers, including, but not limited to, notices, orders, reports, pleadings, motions, applications or petitions, requests, disclosure statements, answer and reply papers, and notice of all hearings or other proceedings relating to any issue which may be raised in the above-captioned case be sent to:

John R. Gardner  
K&L Gates LLP  
301 Hillsborough Street, Suite 1200  
Raleigh, NC 27603  
Telephone: (919) 743-7325  
Email: John.Gardner@klgates.com

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code provisions specified above, but also includes all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, that affect or seek to affect in any way the rights or interests of LIR or any other party-in-interest in this proceeding; or require or prohibit, or seek to require or prohibit, any act, delivery of any property, payment or other conduct by LIR or any other party-in-interest.



**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is not a general authorization, consent to venue, or consent for service of process, and any subsequent appearance, pleading, claim, or suit is not intended nor shall it be deemed to waive LIR's: (i) right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are hereby expressly reserved.

Dated: March 12, 2026

**K&L GATES LLP**

/s/ John R. Gardner

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*Counsel for Land Investment Resources LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 12, 2026 I caused a copy of the foregoing *Notice of Appearance and Request for Service of Papers* to be served on those persons receiving notice through CM/ECF.

/s/ John R. Garnder

John R. Garnder