

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

In Re:

BRD LAND & INVESTMENT, et al.

Debtors.

Case No. 26-30215

Chapter 11

**VERIFIED STATEMENT OF MAYNARD NEXSEN P.C.
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Maynard Nexsen P.C. ("Maynard Nexsen") submits the following verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. I am an attorney with Maynard Nexsen P.C. with offices in Raleigh, North Carolina and elsewhere.

2. I make this Verified Statement (the "Statement") pursuant to Federal Rule of Bankruptcy Procedure 2019 under penalty of perjury and have personal knowledge of the facts set forth herein.

3. As of the date hereof, Maynard Nexsen represents the following parties in interest (the "Creditors") in connection with the Debtor's bankruptcy filing. The specific nature of the claims held by the Creditors are:

- a. Meritage Homes of the Carolinas, Inc.
18655 North Claret Drive, Suite 400
Scottsdale, AZ 85255

Meritage Homes of the Carolinas, Inc. and BRD Land & Investment are parties to a Purchase and Sale Agreement and Joint Instructions dated October 1, 2025, as amended, related to land located in Waxhaw, Union County, North Carolina.

- b. Stanley Martin Homes, LLC
820 Forest Point Circle, Suite 100
Charlotte, NC 28273



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Stanley Martin Homes, LLC and BRD Land & Investment are parties to several development agreements related to property referred to as the Pinewood Project, Riverbend Project, and Longleaf Project.

4. Upon information and belief, Maynard Nexsen does not hold any claims against the Debtor.

5. Maynard Nexsen makes this Statement solely for disclosure purposes pursuant to Federal Rule of Bankruptcy Procedure 2019, and nothing herein is, or should be construed as, an admission, acknowledgement, or waiver by or on behalf of any of the Creditors.

I declare under penalty of perjury that the statements made herein are true and accurate, to the best of my knowledge, information and belief.

This 17th day of March, 2026.

By: /s/ Lisa P. Sumner
Lisa P. Sumner
MAYNARD NEXSEN PC
N.C. Bar No.: 22838
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*Counsel for Meritage Homes of the
Carolinas, Inc. and Stanley Martin
Homes, LLC*

CERTIFICATE OF SERVICE

I certify that I have this date, served or caused to be served a copy of the **VERIFIED STATEMENT OF MAYNARD NEXSEN P.C. PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019** by the Court's CM/ECF electronic service on the following parties and on those additional parties registered to receive notices in that manner in this case.

Natalie Kutcher
Matthew L. Tomsic
Rayburn Cooper & Durham, PA
227 W Trade St., Suite 1200
Charlotte, NC 28202
Counsel for the Debtor

U.S. Bankruptcy Administrator Office
401 W Trade St.
Suite 2400
Charlotte, NC 28202
Trustee

This 17th day of March, 2026.

By: /s/ Lisa P. Sumner
Lisa P. Sumner
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