

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

IN RE:

**BRD LAND & INVESTMENT, *et al.*,¹

DEBTOR.**

**CASE NO.: 26-30215
CHAPTER 11**

**VERIFIED STATEMENT OF BUCKMILLER & FROST, PLLC PURSUANT
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Fed. R. Bankr. P. 2019, the law firm of BUCKMILLER & FROST, PLLC (“BBF”), hereby provides notice of its representation of more than one creditor and party-in-interest in the above-captioned jointly-administered chapter 11 bankruptcy proceedings filed by the Debtors BRD LAND & INVESTMENT (“BRD”), BRDL WARDEN STATION, LLC (“Warden Station”) (4687), and BRDL WARDEN STATION HOLDING CO., LLC (“Warden Station Holding”) (collectively, the “Debtors”) (collectively, the “Bankruptcy Cases”), and states as follows:

1. As of the date of this *Verified Statement of Buckmiller & Frost, PLLC Pursuant to Federal Rule of Bankruptcy Procedure 2019* (the “Verified Statement”), BF represents the following creditors and parties in interest in the Bankruptcy Case, for which disclosure is required pursuant to Fed. R. Bankr. P. 2019:

**A. Wilmington River Club, LLC
Attn: Manager, Agent or Officer
1015 Ashes Drive, Suite 202
Wilmington, North Carolina 28405**

WILMINGTON RIVER CLUB, LLC (“WRC”), a North Carolina limited liability company with a principal place of business located in Wilmington, North Carolina, is a party to the Purchase Sale Agreement with BRD LAND & INVESTMENT, as amended and modified by the Amendment to Purchase Sale Agreement dated January 5, 2023 (the “First WRC PSA Amendment”), the Second Amendment to Purchase Sale Agreement dated March 4, 2023 (the

¹ The Debtors in the jointly administered chapter 11 bankruptcy proceedings are the following entities, with the last four digits of their respective taxpayer identification numbers in parentheses: BRD Land & Investment (6940), BRDL Warden Station, LLC (4687), and BRDL Warden Station Holding Co., LLC (0184).



“Second WRC PSA Amendment”), the Third Amendment to Purchase Sale Agreement dated September 14, 2023 (the “Third WRC PSA Amendment”), the Fourth Amendment to Purchase Sale Agreement dated December 29, 2023 (the “Fourth WRC PSA Amendment”), the Fifth Amendment to Purchase Sale Agreement dated October 28, 2025 (the “Fifth WRC PSA Amendment”), and the Sixth Amendment to Purchase Sale Agreement dated December 19, 2025 (the “Sixth WRC PSA Amendment”) (collectively, the “WRC PSA”), relating to the purchase and sale of certain real property consisting of 150 +/- acres of real property located on Cedar Hill Road, in Brunswick County, North Carolina (the “WRC Property”).

B. T&TG9, LLC
Attn: Manager, Agent or Officer
Post Office Box 295
Springfield, Georgia 31329

T&TG9, LLC (“T&TG9”), a Georgia limited liability company with a principal place of business in Effingham County, Georgia, is a party to the Purchase and Sale Agreement with BRD LAND & INVESTMENT, as amended and modified by the Amendment to Purchase and Sale Agreement entered into as of December 5, 2022 (the “First PSA Amendment”), the Second Amendment to Purchase and Sale Agreement (“Second PSA Amendment”), the Third Amendment to Purchase and Sale Agreement entered into as of July 17, 2023 (“Third PSA Amendment”), and the Fourth Amendment to Purchase and Sale Agreement entered into as of January 13, 2025 (“Fourth PSA Amendment”) (collectively, the “T&TG9 PSA”), relating to real property consisting of 290.12 +/- acres in Effingham County, Georgia (the “T&TG9 Property”).

2. To the extent necessary and required, BF has advised, consistent with N.C. R. Prof. Cond. 1.7, both WRC and T&TG9 with respect to its concurrent representation of them in the Bankruptcy Case, and both have tendered their informed consent to the concurrent representation in the Bankruptcy Cases.

3. BBF’s representation of both WRC and T&TG9 is not prohibited by applicable North Carolina law, does not involve the assertion of a claim by either WRC and/or T&TG9 against one another, and BF reasonably believes that it can, and will be able to, provide competent and diligent representation to both in the Bankruptcy Cases.

4. BF does not hold any claims against, or interest in, the Debtors.

5. BF makes this Verified Statement solely for disclosure purposes and in accordance with the requirements of Fed. R. Bankr. P. 2019 and, nothing herein is, or should be construed as, an admission, acknowledgement, or waiver by or on behalf of either WRC or T&TG9.

6. All of the statements and information set forth herein are true and accurate and, likewise, based upon the personal knowledge of BF, by and through its members.

Executed this, the 19th day of March, 2026.

BUCKMILLER & FROST, PLLC

BY: s/ Joseph Z. Frost

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Counsel for Wilmington River Club, LLC and
T&TG9, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is, and at all times hereinafter was, more than eighteen (18) years of age, and on this date, a true and accurate copy of the foregoing **VERIFIED STATEMENT OF BUCKMILLER & FROST, PLLC PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019** was electronically filed utilizing the CM/ECF system, notification of which was remitted to all registered ECF participants in the above-captioned and jointly-administered bankruptcy proceedings.

Executed this, the 19th day of March, 2026.

s/Joseph Z. Frost _____
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