Docket #0510 Date Filed: 10/30/2026

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

IN RE:	Chapter 11
BRD LAND & INVESTMENT, et al.	Case No. 26-30215
	(Jointly Administered)
Debtors.[1]	

DEBTORS' *EX PARTE* MOTION
FOR ORDER SHORTENING NOTICE

BRD Land & Investment, BRDL Warden Station Holding Co, LLC and BRDL Warden Station, LLC (the "Debtors") as debtors and debtors-in-possession of the above-captioned case, hereby move (the "Motion to Shorten Notice") the Court for entry of an order (the "Order"), pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rules 9006-1(a) of the Rules of Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the "Local Rules"), shortening notice of *Debtors' Ex Parte Application to Employ Guyton Law Firm as Special South Carolina Transaction Counsel for Debtors and Debtors-in-Possession as of October 13, 2026* [Docket No. 505] (the "Employment Application"). In support of the Motion to Shorten Notice, the Debtors respectfully state as follows:

1. The Debtors requests that this Court shorten the required notice period, pursuant to Bankruptcy Rule 9006 and Local Rule 9006-1(a) so that the Employment Application[2] can be

[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] To the extent not defined herein, capitalized terms shall have the meaning given to them by the Employment Application.

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heard by the Court on November 17, 2025. This Motion to Shorten is brought on an *ex parte* basis pursuant to Local Rule 9013-1(f).

2. Good cause exists to shorten notice. First, the Court has requested a hearing regarding this matter, which was originally filed on an *ex parte* basis. Secondly, the Debtors wish to employ Mr. Guyton as soon as possible to obtain his assistance in negotiating contracts related to a parcel owned by BRDL Warden Station, LLC. Mr. Guyton's assistance is necessary to increase the marketability of the parcel, which the Debtors intend to sell for the benefit of BRDL Warden Station, LLC's estate and creditors during the proposed liquidation process.

3. For the foregoing reasons, the Debtor believes good cause exists to shorten notice related to the Assumption and Assignment Motions and respectfully requests the Court enter an order substantially in the form of **Exhibit A**.

Dated: October 30, 2026.
Charlotte, North Carolina

RAYBURN COOPER & DURHAM, P.A.

By: /s/ Matthew L. Tomsic
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Exhibit A

Proposed Order

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

IN RE:	Chapter 11
BRD LAND & INVESTMENT, et al.	Case No. 26-30215
	(Jointly Administered)
Debtors.[3]	

ORDER SHORTENING NOTICE

THIS CAUSE coming on to be heard before the undersigned United States Bankruptcy Judge upon the Debtors' *Ex Parte Motion for an Order Shortening Notice* (the "Motion to Shorten Notice") in respect of hearings on *Debtors' Ex Parte Application to Employ Guyton Law Firm as Special South Carolina Transaction Counsel for Debtors and Debtors-in-Possession as of October 13, 2026* [Docket No. 505] (the "Employment Application"), and the Court, having reviewed the pleadings and the Court's file and for good cause shown, it is hereby ORDERED:

1. The Motion to Shorten Notice is GRANTED.

[3] 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. That the hearing on the Motion to Dismiss shall occur on November 17, 2026, at 9:30 a.m. EDT or as soon as thereafter the Court is able to hear the matter, in the United States Bankruptcy Court for the Western District of North Carolina, Courtroom 2A, 401 West Trade Street, Charlotte, North Carolina, 28202.

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