UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

Fieldstone A&E, LLC, *d/b/a* Fieldstone Architecture & Engineering, *d/b/a* Fieldstone A & E, *d/b/a* Fieldstone Engineering, *d/b/a* Fieldstone Architecture, Debtor.	Bankruptcy Case No. 26-48494-tjt Hon. Thomas J. Tucker Chapter 11 *Subchapter V*

FIRST DAY MOTION FOR ENTRY OF ORDER AUTHORIZING THE CONTINUED USE OF DEBTOR'S PREPETITION CASH MANAGEMENT SYSTEM, BANK ACCOUNTS, AND BUSINESS FORMS

NOW COMES Fieldstone A&E, LLC, *d/b/a* Fieldstone Architecture & Engineering, *d/b/a* Fieldstone A&E, *d/b/a* Fieldstone Engineering, *d/b/a* Fieldstone Architecture (the "Debtor"), as Debtor and Debtor in possession, by and through its counsel, Stevenson & Bullock, P.L.C., and who hereby requests that this Court enter an Order, substantially in the form attached hereto as Exhibit 1.

The Debtor, in support of its First Day Motion for Entry of Order Authorizing Continued Use of Debtor's Prepetition Cash Management System, Bank Account, and Business Forms (the "Motion") states:

JURISDICTION

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. Venue of this proceeding and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409(a).

BACKGROUND

4. On July 30, 2026, the Debtor filed a voluntary petition (the "Petition Date") in this Court for relief under chapter 11, subchapter V, of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as amended (the "Bankruptcy Code").

5. The Debtor continues to manage and operate its business as debtor-in-possession pursuant to § 1184 of the Bankruptcy Code.

6. A subchapter V Trustee has not yet been appointed or designated in this case.

7. Ryan Rasmussen is the responsible person for the Debtor.

8. The factual background relating to the Debtor's commencement of the chapter 11 case is set forth in detail in the Declaration of Ryan Rasmussen in Support of First Day Pleadings (the "Rasmussen Declaration"), which is being filed contemporaneously herewith and is incorporated herein by reference.

9. Prior to the Petition Date, the Debtor maintained the following checking accounts:

a. The Huntington National Bank: Checking ending 8396;

b. The Huntington National Bank: MMA ending 7844;

c. Bank of America: Checking ending 9080; and

d. Bank of America: Checking ending 9093.

10. The Debtor is not seeking relief as to The Huntington National Bank accounts and will close the same pursuant to the applicable United States Trustee guidelines.

11. The Debtor utilizes its Bank of America prepetition accounts (collectively, the "Prepetition Accounts") for all aspects of its operations, including the receipt of client payments and payroll.

12. The Office of the U.S. Trustee has established certain operating guidelines for debtors-in-possession in order to supervise the administration of chapter 11 cases. These guidelines require chapter 11 debtors to, among other things, close all existing bank accounts and establish new debtor-in-possession accounts ("DIP Accounts").

13. The guidelines also require debtors to close their corporate books and records as of the Petition Date and open new books and records to reflect solely post-petition operations.

14. The Prepetition Accounts serve as the Debtor's principal depository account through which substantial ACH payments from customers are received and

processed. Many of the Debtor's customers are large corporate entities that require significant lead time and internal approval processes to modify payment instructions.

15. Accordingly, an immediate closure of the account would likely disrupt the Debtor's cash flow and business operations. In addition, the Debtor utilizes Bank of America's Cash Pro platform to process payroll, and transitioning payroll services to a new financial institution would require substantial coordination, testing, and implementation efforts to ensure employees are paid timely and accurately.

16. Put simply, maintaining the Prepetition Accounts during this transition period is essential to preserving the Debtor's ongoing business operations and maximizing value for the estate.

17. The Debtor also uses a variety of business forms. In order to minimize expenses to the estate, as well as to minimize any disruptions to its business, the Debtor also requests that it be authorized to continue to use all current correspondence, business forms (i.e. – letterhead, purchase orders, employment applications, marketing materials, invoices, etc.), and bank checks in the form they existed as of the Petition Date with respect to the Prepetition Accounts and without reference to debtor-in-possession. The use of new business forms would increase the Debtor's operational and administrative costs.

18. Accordingly, based on the reasons set forth herein, the Debtor believes good cause exists to request relief from these guidelines.

RELIEF REQUESTED

19. By this Motion, the Debtor seeks entry of an order, substantially in the form attached hereto, that provides for the Debtor to maintain and use (i) its existing Prepetition Accounts and cash management systems for purposes of the receipt of funds, while still requiring the Debtor to sweep such accounts to a newly-established DIP account for payments; and (ii) all existing pre-petition Business Forms, materials, and processes.

20. The Debtor submits that the relief requested herein is appropriate and will be within the authority of this Court. The Debtor's request for authorization to continue use of its existing account has been held to be entirely consistent with § 363(c)(1) of the Bankruptcy Code. *See In re Dant & Russell, Inc*., 853 F.2d 700, 704 (9th Cir. 1988).

21. Additionally, in many chapter 11 cases, courts often waive the U.S. Trustee guidelines such as these recognizing that such requirements are often impractical and potentially detrimental to a debtor's post-petition business operations and restructuring efforts. *See, e.g., In re Greektown Holdings, L.L.C.*, Case No. 08-53104 [Doc. 133, June 18, 2008]; and *In re St. Jude Nursing Center, Inc.*, Case No. 18-54906 [Doc. 36, November 9, 2018].

22. Requests such as those sought by this Motion have been treated by bankruptcy courts as a relatively "simple matter." *In re Baldwin-United Corp.,* 79 B.R. 321, 327 (Bankr. S.D. Ohio 1987).

23. Moreover, Bankruptcy Code § 105(a) permits the Court to "issue any order. . . necessary or appropriate to carry out the provisions" of the Bankruptcy Code. Granting the relief requested in this Motion is an appropriate use of the authority granted to this Court under § 105(a).

NOTICE

24. Notice of this Motion has been provided to the Office of the United States Trustee, and the Debtor's twenty (20) largest unsecured creditors. In light of the nature of the relief requested, the Debtor submits no further notice is necessary.

25. The Debtor intends to request that the Court consider this Motion on an expedited basis, and has, contemporaneously with the filing of this Motion, requested the same from the Court as is authorized pursuant to E.D. Mich. LBR 9013-1(c).

NO PRIOR REQUEST

26. No previous motion for the requested relief sought herein has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtor respectfully requests entry of an Order, in sufficiently the same form as attached hereto as Exhibit 1, granting the relief requested herein and granting the Debtor such other and further relief as may be just.

Respectfully submitted,
STEVENSON & BULLOCK, P.L.C.

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Dated: July 30, 2026

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF: Fieldstone A&E, LLC, *d/b/a* Fieldstone Architecture & Engineering, *d/b/a* Fieldstone A & E, *d/b/a* Fieldstone Engineering, *d/b/a* Fieldstone Architecture, Debtor.	Bankruptcy Case No. 26-48494-tjt Hon. Thomas J. Tucker Chapter 11 *Subchapter V*

ORDER AUTHORIZING CONTINUED USE OF DEBTOR'S PREPETITION CASH MANAGEMENT SYSTEM, BANK ACCOUNTS, AND BUSINESS FORMS

This matter is before the Court on the Debtor's First Day Motion for Entry of Order Authorizing Continued Use of Debtor's Prepetition Cash Management System, Bank Account, and Business Forms (the "Motion")[1] filed by Fieldstone A&E, LLC, *d/b/a* Fieldstone Architecture & Engineering, *d/b/a* Fieldstone A&E, *d/b/a* Fieldstone Engineering, *d/b/a* Fieldstone Architecture (the "Debtor"). The Court having considered the Motion and finding that it has jurisdiction over this proceeding; that this is a core proceeding; that the service and notice of the Motion was sufficient under the circumstances; that no further notice is necessary; that the

[1] Capitalized terms used but not defined herein shall have the meanings as set forth in the Motion.

relief sought in the Motion is in the best interests of the Debtor, its estate, and its creditors; and that good and sufficient cause exists for such relief.

Accordingly, it is hereby ORDERED as follows:

1. The Motion is GRANTED.

2. Subject to further order of this Court, the Debtor is permitted to use its existing bank accounts, consisting of two checking accounts at Bank of America ending in 9080 and 9093 (the "Pre-Petition Bank Accounts"), pursuant to the terms of this Order.

3. Within fourteen (14) days from the entry of this Order, the Debtor shall open a debtor-in-possession bank account that comports with the Chapter 11 Guidelines for Region 9, Operating Instructions and Reporting Requirements (the "DIP Bank Account").

4. Notwithstanding anything to the contrary in the UST Guidelines, until the DIP Bank Account is opened, the Debtor is permitted to disburse money from its Pre-Petition Bank Accounts by existing checks, ACH transfer, or debit.

5. Once the DIP Bank Account is opened, all disbursements from the Debtor shall be from the DIP Bank Account by check, ACH transfer, or debit. Any check issued by the Debtor from the DIP Bank Account shall have a debtor-in-possession designation and include this bankruptcy case number.

6. Once the DIP Bank Account is opened, the Debtor shall immediately sweep all funds in the Pre-Petition Bank Accounts into the DIP Bank Account. Thereafter, the Debtor shall sweep all funds from the Pre-Petition Bank Accounts into the DIP Account as necessary to fund the Debtor's disbursements, but in no event less than one sweep per week.

7. The Debtor must, within fourteen (14) days of the entry of this Order, open a separate Debtor in Possession bank account in which it may segregate funds for anticipated professional fees that comports with the Chapter 11 Guidelines for Region 9, Operating Instructions and Reporting Requirements (the "Professional Fee Account").

8. Bank of America: (a) is authorized to continue servicing and administering the Pre-Petition Bank Accounts without interruption and in the usual and ordinary course; (b) is authorized to accept and honor all representations and instructions from the debtor; (c) has no duty to inquire as to whether Debtor's account activity or disbursements are authorized by any order(s) of this Court; and (d) has no liability to any party on account of following the Debtor's instructions or if Debtor fails to comply with any order(s) of the Court. All other terms of the contractual arrangements between Debtor and Bank of America shall continue to apply.

9. Subject to further order of this Court, the Debtor is authorized to utilize and maintain all pre-petition Business Forms and related operational materials and practices as they existed as of the Petition Date, except as provided herein.

10. Notwithstanding the possible applicability of Bankruptcy Rules 6004(g), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon their entry.

11. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.