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

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

FIRST DAY MOTION FOR ENTRY OF ORDER ESTABLISHING A SPECIAL SERVICE LIST

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 hereby requests that this Court enter an Order substantially in the form attached hereto as Exhibit 1.

Debtor, in support of its First Day Motion For Entry of Order Establishing a Special Service List (the "Motion") states as follows:

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 "Petition Date") the Debtor filed a voluntary petition for relief in this Court under chapter 11 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. Opened in 2010, Debtor is a full-service architecture, engineering, and interior design firm. Debtor's products and services address the needs of single-family, multi-family, and commercial construction. The Debtor has integrated design services that understand both the architecture and engineering necessary for construction projects. The Debtor is extremely versatile and can handle any size

project from a 1,500-square-foot single family home to 40,000-square-foot club houses. The Debtor works directly with home builders and specializes in creating a theme and consistency in the project.

10. Debtor is a professional service provider that owns computers, phones, and printers with the goal of providing the client plans and blueprints for permitting.

11. The bankruptcy was filed to address potential construction defect claims. The Debtor submits that this Court is the best forum in which to implement appropriate procedures to equitably determine the rights of and allocate recoveries to the construction defect claims.

12. The Debtor filed this bankruptcy to reorganize its financial affairs. The Debtor is confident in its ability to emerge from its reorganization as a stronger, more efficient, operation while furthering its mission.

RELIEF REQUESTED

13. Debtor seeks entry of an order, substantially in the form attached as Exhibit 1, establishing a special service list under Fed. R. Bankr. P. 2002 and E.D. Mich. LBR 2002-1, and authorizing Debtor's claims and noticing agent to utilize a single consolidated mailing matrix.

BASIS FOR RELIEF REQUESTED

A. Special Service List

14. Federal Rules of Bankruptcy Procedure 2002(i) and 2002(m) authorize the Court to permit special notice procedures.

15. Rule 2002(i) states in part:

> Notwithstanding the foregoing subdivisions, the court may order that notices required by subdivision (a)(2), (3), and (6) of this rule be transmitted to the United States trustee and be mailed only to the committees elected under § 1102 of the Code or to their authorized agents and to the creditors and equity security holders who serve on the trustee or debtor in possession and file a request that all notices be mailed to them. A committee appointed under § 1114 shall receive copies of all notices required by subdivisions (a)(1), (a)(5), (b), f(2), and (f)(7), and such other notice as the court may direct.

16. Rule 2002(m) states:

> The court may from time to time enter orders designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as otherwise provided by these rules.

17. Under E.D. Mich. LBR 2002-1, the Court may enter an order authorizing a special service list upon the filing of a motion for cause shown.

18. There are approximately 500 parties in interest involved in Debtor's chapter 11 case. There is expected to be substantially more than that through notice to unknown parties requested in the Motion.

19. Debtor requests that notice in its chapter 11 case be limited as provided in Fed. R. Bankr. P. 2002(i) and (m) and E.D. Mich. LBR 2002-1 so that all notices in this case need only be served upon the following (collectively, "Special Service List"):

United States Trustee;

Debtor;

Debtor's counsel;

General and local counsel for any committee that may be appointed in this case;

Any secured creditors and their counsel;

All taxing authorities;

subchapter V Trustee;

Any party that may be added to the Special Service List; and

Any party against whom direct relief is sought by motion, application or otherwise.

20. The establishment of the Special Service List is in the best interest of Debtor's estate because notice to all creditors would impose a substantial administrative and economic burden on Debtor.

21. The adoption of the proposed Special Service List is appropriate to ensure adequate representation of the interests of the holders of claims and interest generally in this chapter 11 case.

22. Any party may seek to be added or deleted from the Special Service List by filing a written request and serving it on the Special Service List parties.

23. In compliance with E.D. Mich. LBR 2002-1(d), at least every 14 days during the first 56 days of this chapter 11 case and thereafter at least every 28 days, Debtor's claims and noticing agent will maintain and update the Special Service List by: (a) making any requested additions or deletions: (b) filing an updated Special Service List; (c) serving an updated Special Service List on the parties listed who are not ECF participants; and (d) filing a certificate of service.

24. Notwithstanding the foregoing, if the Bankruptcy Code, Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules, or order of this Court permit notice of a particular type of proceeding to be given to fewer than all the parties listed on the Special Service List, Debtor may give notice and serve pleadings only on those parties entitled to receive notice.

25. Finally, with respect to general noticing procedures in this chapter 11 case, Debtor requests that, in addition to the methods of service authorized by the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules, the service of notices, pleadings, and other documents by deposit with a reputable overnight delivery service be authorized and deemed the equivalent of service by hand delivery for all purposes other than service of process under Fed. R. Bankr. P. 7004.

26. The Debtor will seek authority to retain a claims and noticing agent to undertake all mailing directed by this Court, the United States Trustee, or as required by the Bankruptcy Code.

27. The claims and noticing agent will assist Debtor in preparing creditor lists and mailing initial notices to creditors, such as (a) notice of filing of this case and any separate but related chapter 11 cases, (b) a notice of a meeting of creditors under Bankruptcy Code § 341, (c) a notice of the time fixed for filing objections to and the hearing to consider confirmation of a plan, and (d) any correspondence Debtor may wish to send to creditors with respect to this, and any separate but related chapter 11 cases. Given the number of mailings that will be required in this chapter 11 case, the Court is likely to direct that Debtor or its claims and noticing agent (and not the Clerk of the Court) handle mailings.

28. Courts in this district have granted relief similar to the relief requested in this Motion. See, e.g., *In re Body Contour Ventures, LLC*, Case No. 19-42510 (Bankr. E.D. Mich. March, 2019); *In re Greektown Holdings, L.L.C.*, Case No. 08-53104 (Bankr. E.D. Mich. May 29, 2008); *In re Plastech Engineered Products*, Case No. 08-42417 (Bankr. E.D. Mich. Feb. 1, 2008); *In re Collins & Aikman Corp*., Case No. 05-55927 (Bankr. E.D. Mich. May 17, 2005); *In re Blue Water Automotive Systems, Inc*., Case NO. 08-43196 (Bankr. E.D. Mich. Feb. 12, 2005).

NOTICE

29. Notice of this Motion has been provided to the Office of the United States Trustee, all secured parties, the twenty largest unsecured creditors, any additional party required by the Special Service List, and any other party requesting notice. Because no trustee, examiner, or creditor's committee has been appointed or formed, Debtor submits that no further notice is required.

NO PRIOR REQUEST

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

WHEREFORE, the Debtor respectfully requests this Honorable Court to:

a. Enter the order substantially in the form attached hereto as Exhibit 1; and

b. Grant such other and further relief as is just and equitable to the Debtor.

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

By: /s/ Charles D. Bullock
Charles D. Bullock (P55550)
Elliot G. Crowder (P76137)
Ernest M. Hassan, III (P67815)
Tayler J. Leamon (P83385)
Counsel for Debtor
26100 American Drive, Suite 500
Southfield, MI 48034
Phone: (248) 354-7906
Facsimile: (248) 354-7907
Email: cbullock@sbplclaw.com
Email: ecrowder@sbplclaw.com
Email: ehassan@sbplclaw.com
Email: tleamon@sbplclaw.com

Dated: July 30, 2026

EXHIBIT 1

PROPOSED ORDER

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

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

ORDER GRANTING THE DEBTOR'S FIRST DAY MOTION FOR ENTRY OF ORDER ESTABLISHING A SPECIAL SERVICE LIST

This matter having come before the Court on the First Day Motion for Entry of Order Establishing a Special Service List (the "Motion")[1]; the Court having reviewed the Motion; the Court having found that (a) jurisdiction to consider the Motion is proper under 28 U.S.C. §§ 157 and 1334; (b) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (c) notice of the Motion was properly provided; (d) good cause exists to grant the relief requested in the Motion; and the Court being fully advised in the premises and having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED that:

1. The Motion is granted.

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

2. All notices required in this proceeding under Fed. R. Bankr. P. 2002(a)(2)-(6) shall be limited to:

United States Trustee;

Debtor;

Debtor's counsel;

General and local counsel for any committee that may be appointed in this case;

Any secured creditors and their counsel;

All taxing authorities;

subchapter V Trustee;

Any party that may be added to the Special Service List; and

Any party against whom direct relief is sought by motion, application or otherwise.

3. Any party may seek to be added or deleted from the Special Service List by filing a written required and serving it on the Special Service List parties.

4. Notwithstanding the foregoing, if the Bankruptcy Code, Federal Rule of Bankruptcy Procedure, Local Bankruptcy Rules, or order of this Court permit notice of a particular type of proceeding to be given to fewer then all the parties listed on the Special Service List, Debtor may give notice and serve pleadings only on those parties entitled to receive notice.

5. In addition to the methods of service authorized by the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules, service of notices, pleadings, and other documents by deposit with a reputable overnight delivery service is authorized and deemed the equivalent of service by hand delivery for all purpose other than service of process under Fed. R. Bankr. P. 7004.

6. In compliance with E.D. Mich. LBR 2002-1(d), at least every 14 days during the first 56 days of the chapter 11 case and thereafter at least every 28 days, Debtor of Debtor's claims and noticing agent will maintain and update the Special Service list by; (a) making any request additions or deletions; (b) filing an updated Special Service List; (c) serving an updated Special Service List on the parties listed thereon who are not ECF participants; and (d) filing a certificate of service.

7. Debtor with the assistance of the noticing and claims agent (upon this Court's authorization of Debtor's engagement of the noticing ang claims agent), are directed to mail initial notices upon the consolidated mailing matrix, such as (a) a notice of filing of this chapter 11 case, (b) a notice of a meeting of creditors under 11 U.S.C. § 341, (c) a notice of the time fixed for filing objections to and the hearing to consider confirmation of a plan, and (d) any correspondence Debtor may wish to send to creditors with respect to this chapter 11 case.

8. Debtor must serve a copy of this Order on all parties on the Debtor's consolidated creditor matrix and file a certificate of service.

9. This Order is immediately effective.

10. The Court retains jurisdiction over all matters related to the implementation of this Order.