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

**IN THE MATTER OF:**

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

**STIPULATION FOR ENTRY OF ORDER**

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") and the below parties, by and through their counsel, hereby stipulate to the entry of the proposed Order Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection attached as "Exhibit 1".

Approved as to form and content.


| **STEVENSON & BULLOCK, P.L.C.** | **PLUNKETT COONEY** |
|---|---|
| By: /s/ Charles D. Bullock<br>Charles D. Bullock (P55550)<br>Elliot G. Crowder (P76137)<br>Ernest M. Hassan, III (P67815)<br>Tayler J. Leamon (P83385)<br>Counsel for Debtor<br>26100 American Drive, Suite 500<br>Southfield, MI 48034<br>Phone: (248) 354-7906<br>Facsimile: (248) 354-7907<br>Email: cbullock@sbplclaw.com<br>Email: ecrowder@sbplclaw.com<br>Email: ehassan@sbplclaw.com<br>Email: tleamon@sbplclaw.com | By: /s/ Douglas C. Bernstein<br>Douglas C. Bernstein (P33833)<br>Counsel for Bank of America<br>38505 Woodward Ave.<br>Suite 100<br>Bloomfield Hills, MI 48304<br>Phone: (248) 901-4091<br>Facsimile: (248) 901-4040<br>Email: dbernstein@plunkettcooney.com |

EXHIBIT 1
Proposed Order

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

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

# ORDER AUTHORIZING THE DEBTOR TO USE CASH COLLATERAL AND GRANTING ADEQUATE PROTECTION

This matter having come before the Court on the Stipulation for Entry of Order ("Stipulation") 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") and Bank of America, N.A. ("Bank of America"), the Court having reviewed the Motion;

THE COURT HEREBY FINDS:

A. On July 30, 2026, (the "Petition Date"), the Debtor filed for relief under chapter 11 of the United States Bankruptcy Code (the "Bankruptcy Code").

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

C. The Court consideration of this Motion constitutes a core proceeding as defined in 28 U.S.C. §§ 157(b)(2)(A),(K), and (M).

D. The procedures set forth in this Order, constitute sufficient "notice and hearing" under §§ 102 and 363(c) of the Bankruptcy Code, Bankruptcy Rule 2002, 4001, 6004, and 9006. This Order is being entered on an interim basis pursuant to Bankruptcy Rule 4001 and is expressly subject to the rights of parties in interest to object as specifically provided in paragraph 9 below. The Debtor requires funds to pay expenses in connection with maintaining operations, including paying employees, continuing production of current products, and providing service to its customers. Failure to pay these and similar critical expenses would cause the Debtor immediate and irreparable harm by disrupting its ability to maintain operations.

E. The Debtor does not have sufficient unencumbered funds to meet these expenses. Accordingly, it requires authorization to use Cash Collateral to avoid immediate and irreparable harm. The amount of cash the Debtor proposes to use is set forth in the budget attached as Exhibit 2 to the Stipulation (the "Budget"). Specifically, during the first three months of this case, the Debtor projects that it will need to spend approximately $4,799,144.00.

Therefore, IT IS HEREBY ORDERED that:

1. The Debtor is authorized to use Cash Collateral and to grant and authorize the Adequate Protection in accordance with the terms of the Motion.

2. To the extent of any diminution in value of the pre-petition Cash Collateral, Bank of America is hereby granted the following Replacement Liens as

adequate protection. The Replacement Liens shall be liens on the Debtor's assets which are created, acquired, or arise after Petition Date, but limited to only those types and descriptions of collateral in which each held a pre-petition lien or security interest. The Replacement Liens shall have the same priority and validity as the pre-petition security interest and liens. Whether or not Bank of America, in its sole discretion, chooses to file a financing statement or otherwise confirm perfection of the liens and security interests granted hereunder, such liens and security interests shall be deemed valid, perfected, allowed, and enforceable, at the time and date of the entry of this Order. For clarity, the collateral securing the Replacement Liens shall not include claims and causes of action under Chapter 5 of the Bankruptcy Code or 11 U.S.C. § 506(c) claims.

3. Additionally, the Debtor is authorized and directed to pay Bank of America adequate protection payments in the amount of $12,500.00 per month commencing with the August 15, 2026, payment.

4. Bank of America is adequately protected.

5. Nothing in this Order constitutes an admission by the Debtor or prejudices the rights of the Debtor to challenge the amount, validity, enforceability, priority or perfection of any liens or security interests asserted by Bank of America and any other party asserting a security interest in Debtor's assets.

6. The Debtor may segregate in a Debtor-in-Possession account $30,000.00 per month for anticipated fees of Stevenson & Bullock, P.L.C. and the Subchapter V Trustee. The segregated funds for Professional Fees will remain property of the estate until such time that fees are allowed under 11 U.S.C. § 330.

7. The Debtor shall, within twenty-four (24) hours following the entry of this order, serve copies of this order and the Stipulation, with all attachments, on each of the Debtor's 20 largest unsecured creditors, Bank of America, the United States Trustee's Office, the subchapter V Trustee, and all other parties who are required to be served under Fed. R. Bankr. P. 4001(d).

8. All parties seeking to object to this Order must file a written objection within fourteen (14) days after the entry of this Order. If an objection is timely filed, the final hearing on this Order will be held before Judge Thomas J. Tucker on _____ _____, 2026 at _____ a.m/p.m. If no timely objection is filed, then this Order will become a final order without further hearing, and the Debtor will be authorized to spend for those expenses referenced in the Budget, as well as any other expenses necessary for operating the business in the ordinary course going forward.

9. The Debtor's use of Cash Collateral shall conform to the amounts set forth in the Budget with a ten percent (10%) variance. It may file with the Court modified or supplemental budgets from time to time and shall be authorized to use Cash Collateral in accordance with such modified or supplemental budgets without

a hearing unless an objection is filed within fourteen (14) days after such modified or supplemental budgets are filed. The Debtor's authority to use Cash Collateral shall continue otherwise ordered by this Court.

10. This Court retains jurisdiction to enforce and interpret this Order.

EXHIBIT 2
Budget

## Fieldstone A&E

*Proposed Cash Collateral Budget*

| Category | Aug | Sep | Oct |
|---|---|---|---|
| **CASH IN / REVENUE** | | | |
| Revenue / Collections (editable) | $1,500,000 | $1,700,000 | $1,700,000 |
| | | | |
| **OPERATING EXPENSES** | | | |
| Salaries & Wages (Gross) | $836,851 | $836,851 | $836,851 |
| Employer Payroll Taxes | $60,412 | $60,412 | $60,412 |
| Employer-Paid Benefits | $124,123 | $124,123 | $124,123 |
| Subconsultants & Project Services | $52,333 | $52,333 | $192,333 |
| Software, IT & Communications | $49,751 | $45,751 | $74,701 |
| Legal, Accounting & Professional | $103,842 | $103,842 | $103,842 |
| Rent, Facilities & Utilities | $26,700 | $26,700 | $26,700 |
| Business Insurance | - | - | - |
| Bank & Merchant Fees | $10,711 | $10,711 | $10,711 |
| Office Supplies & Equipment | $15,000 | $15,000 | $15,000 |
| Employee Expense Reimbursements | $13,169 | $13,169 | $13,169 |
| Travel & Vehicle | $11,866 | $11,866 | $11,866 |
| Meals, Entertainment & Gifts | $8,362 | $8,362 | $8,362 |
| Business Development | $5,200 | $14,000 | - |
| Contract Labor | $117,321 | $117,321 | $136,071 |
| Recruiting, Training & Dues | $2,723 | $2,723 | $2,723 |
| Printing, Shipping & Office Services | $4,084 | $4,084 | $4,084 |
| Other / Miscellaneous | $2,000 | $2,000 | $2,000 |
| **Total Operating Expenses** | **$1,444,448** | **$1,449,248** | **$1,622,948** |
| | | | |
| **NON-OPERATING CASH ITEMS** | | | |
| Taxes | - | $200,000 | - |
| Line of Credit Payments | $10,000 | $10,000 | $10,000 |
| Deductible Payments | $15,000 | $15,000 | $15,000 |
| **Total Non-Operating** | **$25,000** | **$225,000** | **$25,000** |
| | | | |
| **TOTAL CASH OUT (incl. non-operating)** | **$1,469,448** | **$1,674,248** | **$1,647,948** |
| | | | |
| **NET CASH FLOW** | **$30,552** | **$25,752** | **$52,052** |