

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

In re: Chapter 11  
GOLIATH VENTURES INC. (FL), Case No. 26-13174-RAM  
GOLIATH VENTURES INC. (WY), Case No. 26-13176-RAM  
Debtors. Jointly Administered

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**DEBTORS' SECOND MOTION TO EXTEND TIME TO FILE  
SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS AND OTHER ITEMS**

**[Hearing Respectfully Requested on May 28, 2026 at 11:30 am,  
When Other Matters in this Bankruptcy Case are Set]**

Goliath Ventures Inc., a Wyoming corporation ("***Goliath WY***"), and Goliath Ventures Inc., a Florida corporation f/d/b/a Gen-Z Venture Firm, Inc. ("***Goliath FL***"), and together with Goliath WY, the "***Debtors***", moves this Court pursuant to F.R.B.P. 1007(c) and L.R. 1007-1(C) ("***Motion***") for the entry of an Order extending the Debtors' deadline to file: *Summary of Schedules, Schedules A/B and D-H, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, List of Equity Security Holders, and Debtor's Notice of Filing Payroll and Sales Tax Reports* (collectively, the "***Filings***"). In support, the Debtors state as follows:

1. On March 3, 2026 and March 5, 2026, Michael S. Budwick was appointed as receiver ("***Receiver***") for the Debtors. [Dkt. No. 20 at Composite Exhibit 1.]
2. On March 16, 2026 ("***Petition Date***"), the Debtors initiated these cases by filing their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code [Dkt. No. 1].
3. The Bankruptcy Code section 341 Meeting of Creditors ("***Meeting of Creditors***") was held on April 22, 2026 [Dkt. No. 10] and then continued to June 26, 2026.
4. On March 31, 2026, the Court entered the Amended Order Extending Debtors'

Deadline to File Schedules, Statement of Financial Affairs and Other Items [Dkt. No. 57], establishing the current deadline for the Filings as May 30, 2026 (“**Deadline**”).

5. While the Debtors have received certain information and documentation, they do not presently possess adequate information to prepare and submit the Filings. The Debtors are working diligently to obtain that information, specifically, the pre-petition books and records and server. Therefore, the Debtors request an extension of the Deadline of sixty days through July 31, 2026 (“**Proposed New Deadline**”).

6. The Debtors’ books and records, and server, are in the possession of the United States of America, after having been turned over in connection with *U.S.A. v. Delgado*, Case No. 26-1240 (M.D. Fla.). The Receiver (pre-petition) and the Debtors (post-petition) requested a duplicate set from the United States and engaged in numerous meet-and-confer sessions on this and other related issues.

7. On April 27, 2026, the Debtors filed their Motion for Approval of Compromise and Settlement with the United States of America: The Coordination Agreement [Dkt. No. 88] (“**Approval Motion**”). Pursuant to that agreement, the United States agreed to take steps to provide the Debtors with a duplicate set of the Debtors’ books and records, and server.

8. The Approval Motion is set for hearing on May 28, 2026. [Dkt. No. 94].

9. The Debtors expect to receive the Debtors’ books and records, and server, within weeks after the Approval Motion (assuming it is granted), which should provide the Debtors with adequate time to prepare and file the Filings by the Proposed New Deadline.

10. While in the instant circumstances any form of the Filings will necessarily contain qualifiers and disclaimers, and potentially be followed by a subsequent amendment(s), the Debtors believe it would be more beneficial and less confusing for parties in interest (many of

whom appear to be crime victims) for the Debtors to defer submission of the Filings until after they receive the books and records, and server. Accordingly, the Debtors submit that granting the Motion and instituting the Proposed New Deadline will result in neither prejudice nor harm to any parties in interest.

11. A proposed order granting the relief sought herein is attached as Exhibit A.

**WHEREFORE**, the Debtors request the entry of an order: (a) granting this Motion, (b) extending the deadline for the Filings as through and including July 31, 2026, and (c) granting such other and further relief that the Court may deem just and proper.

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served on May 7, 2026, via the Court's Notice of Electronic Filing upon the Registered Users listed on the attached Exhibit 1, via U.S. Mail upon the parties listed on the Court's Matrices in Case No. 26-13174-RAM and Case No. 26-13176-RAM attached as Composite Exhibit 2<sup>1</sup>, and on the Master Service List pursuant to Local Rule 2002-1(H)(1) attached as Exhibit 3.

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<sup>1</sup> “**INC**” means that the Matrix contains an incomplete addresses; hence, no service by mail.  
“**NEF**” means that service was made by Notice of Electronic Filing as set forth on Exhibit 1 and is not being additionally served by mail.  
“**NNR**” means no notice is required.  
“**GVFL**” means that entity appears on both matrices and only being served once.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
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In re:

Chapter 11

GOLIATH VENTURES INC. (FL),  
GOLIATH VENTURES INC. (WY),

Case No. 26-13174-RAM  
Case No. 26-13176-RAM  
Jointly Administered

Debtors.

**SECOND ORDER EXTENDING DEBTORS' DEADLINE TO FILE  
SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS AND OTHER ITEMS**

THIS MATTER came before the Court upon the *Debtors' Second Motion to Extend Time to File Schedules, Statement of Financial Affairs and Other Items* [Dkt. No. \_\_\_\_] (the "**Motion**"), pursuant to Federal Rule of Bankruptcy Procedure 1007(c) and Local Rule 1007-1(C). The Motion seeks the entry of an Order extending the Debtors' deadline to file the following documents: *Summary of Schedules, Schedules A/B and D-H, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, List of Equity Security Holders, and Debtor's Notice of Filing Payroll and Sales Tax Reports* (collectively, the "**Filings**"). The Court, having

reviewed the Motion, and finding good cause therefor,

**ORDERS** as follows:

1. The Motion is **GRANTED**.
2. The Debtors' deadline to file the Filings is extended through and including July 31, 2026.
3. The Clerk of Court is directed to docket a copy of this order in the member case, Case No. 26-13176-RAM.

###

**Submitted By:**

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**Copies Furnished To:**

Solomon B. Genet, Esquire, is directed to serve copies of this Order on all parties in interest and to file a Certificate of Service.

## Mailing Information for Case 26-13174-RAM

### Electronic Mail Notice List

The following is the list of parties who are currently on the list to receive email notice/service for this case.

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Label Matrix for local noticing  
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Case 26-13176-RAM  
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