

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

IN RE:

CHAPTER 11

Goliath Ventures Inc.,

Case No.: 26-13174-RAM

Debtor.

**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ENTRY OF AN ORDER AUTHORIZING EMPLOYMENT OF PHANG &
FELDMAN, P.A. AS COUNSEL AS OF APRIL 24, 2026**

The Official Committee of Unsecured Creditors (“Committee”) for Goliath Ventures Inc. (“Debtor”), submits its application for entry of an Order pursuant to 11 U.S.C. §§ 328(a) and 1103(a) and *Fed. R. Bank. P.* 2014 authorizing the employment and retention of Phang & Feldman, P.A. (“P&F”), as counsel for the Committee as of April 24, 2026, and in support states as follows:

BACKGROUND

1. Pre-petition, Michael S. Budwick (“Receiver”) was appointed to serve as receiver of the Debtor in the state court case styled *Mehal Patel v. Goliath Ventures Inc.*, Case No. CACE-26-003310, pending in the Seventeenth Judicial Circuit in and for Broward County, Florida.
2. On March 16, 2026, the Receiver commenced this bankruptcy case and a companion case for a Wyoming entity that shared a similar name and common ownership with the Debtor.
3. On April 10, 2026, the United States Trustee filed its Appointment and Notice of Appointing of a Joint Committee of Creditors Holding Unsecured Claims to represent the interests of all unsecured creditors in these cases [ECF No. 63].



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RELIEF REQUESTED

4. After reviewing the facts and issues in this case, the Committee concluded that the assistance of legal counsel is necessary to enable it to discharge its statutory duties and powers.

5. The Committee selected and retained P&F as counsel for the Committee, subject to the approval of this Court.

6. By this Application, the Committee seeks to employ and retain P&F pursuant to §§ 328(a) and 1103(a) of the Bankruptcy Code as counsel to provide legal services in connection with the Committee's performance of its duties and obligations to the bankruptcy estate. The Committee requests that the Court approve the employment of P&F as of April 24, 2026, the date upon which P&F commenced providing legal services to the Committee.

7. Bankruptcy Code § 328(a) provides that the Committee is authorized to employ attorneys under § 1103(a) with the Court's approval, provided such terms and conditions are reasonable.

8. The Committee seeks to retain P&F as counsel because of P&F's extensive general legal expertise and particular knowledge in the area of debtors' and creditors' rights and fraud litigation. The Committee believes that P&F is both well-qualified and able to represent the Committee in discharging its statutory duties and powers.

9. Subject to Court approval, the professional services that P&F will be required to render, shall include:

- a. Providing legal advice with respect to the Committee's powers and duties as appointed under Bankruptcy Code section 1102;
- b. Assisting in the investigation of the acts, conduct, assets, liabilities and



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financial condition of the Debtor, the operation of the Debtor's businesses, and any other matter relevant to this case or to the formulation of a plan or plans of reorganization or liquidation;

- c. Preparing on behalf of the Committee necessary motions, applications, answers, orders, reports and other legal papers;
- d. Reviewing, analyzing and responding to pleadings filed in these cases and appearing before the Court to present necessary motions, applications and pleadings and to otherwise protect the Committee's interests;
- e. Advising the Committee with regard to all substantive issues and procedures involving otherwise applicable non-bankruptcy law arising in the case;
- f. Representing the Committee in hearings and other judicial proceedings;
- g. Advising the Committee of its fiduciary duties and responsibilities;
- h. Advising the Committee and its other professionals on practice and procedure in the Bankruptcy Court for the Southern District of Florida; and
- i. Performing any and all other legal services in connection with this chapter 11 case as may reasonably be required.

10. Subject to this Court's approval, P&F will charge for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates for services of this type and nature, and for this type of matter, in effect in the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith, as set forth more fully in the Declaration of Jonathan S. Feldman, Esq. (the "Feldman Declaration") attached as **Exhibit A**.

11. P&F will apply to the Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Federal Rules



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of Bankruptcy Procedure, the Local Bankruptcy Rules, orders of this Court and the U.S. Trustee Guidelines for Fee Applications.

12. Compensation will be payable to P&F subject to order of this Court, on an hourly basis, plus reimbursement of actual, necessary expenses incurred by the firm.

13. To the best of the Committee's knowledge, except as otherwise disclosed in the Feldman Declaration and immediately below, P&F and its respective attorneys (i) do not hold or represent any interest adverse to the Committee on any matters in which they are to be engaged, and (ii) have no connections to the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the Office of the United States Trustee with respect to the matters in which P&F is to be employed. The following matters are set forth in the Feldman Declaration and disclosed in this application:

- a. Mr. Feldman represented Eric Clayman in litigation commenced against him and others in February 2026 by an investor in Goliath in the District Court for the Middle District of Florida, Case No. 6:26-cv-00392-GAP-RMN¹ and
- b. Mr. Feldman entered an appearance on behalf of unsecured creditor Todd Rideman in the Debtor's case to prepare a proof of claim and to otherwise advise or represent him on issues that may arise.²

14. In the event any issue arises as to the above items, the Committee will employ

¹ Clayman served as outside counsel to Goliath and represented Christopher Delgado. Separately, Clayman, his father and father-in-law, were investors in Goliath, making a collective investment in excess of \$1,000,000 and were net losers on a cash-in, cash-out basis. To partially fund the investment, Clayman obtained a \$500,000 home equity line of credit on his personal residence in February 2025 and wired the net proceeds from this transaction to Goliath.

² Mr. Rideman invested \$200,000 in Goliath and suffered a loss on a cash in, cash out basis, of approximately \$100,000.



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conflicts counsel, if necessary.

15. The firm separately confirmed with the Receiver that he has no opposition to the Committee' retention of P&F based on the above-disclosed relationships with the understanding that P&F will recuse itself with respect to any issues relating to Mr. Clayman.


16. To the best of the Committee's knowledge, except as otherwise disclosed in the Feldman Declaration and this application, P&F and its attorneys are "disinterested persons" as that phrase is defined in section 101(14) of the Bankruptcy Code and (ii) P&F neither represents nor holds an interest adverse to the interest of the estate with respect for matters which P&F is to be employed.

17. The Committee believes that retention of P&F is in the best interests of the Committee, the Debtor, the estates and creditors.

18. No prior applications have been made to this or any other Court for the relief requested herein.

WHEREFORE, the Committee requests the Court enter an Order authorizing and approving the Committee's employment of Phang & Feldman, P.A. as its counsel effective April 24, 2026, and granting such other relief the Court deems just and proper.

Official Committee of Unsecured Creditors
("Committee") for Goliath Ventures Inc.

By: 

Name: John Euliano

Title: Chairperson



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 7, 2026, a true and correct copy of the foregoing was served based on the Court docket, by transmission of Notices of Electronic Filing (“NEF”) generated by CM/ECF to those parties registered to receive NEF in this case.

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By: /s/ Jonathan S. Feldman
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