

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

In re:

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

Chapter 11

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

MOTION TO APPEAR *PRO HAC VICE*

Motion and Affidavit of Member Counsel:

I, James N. Robinson (“Movant”), a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, request that this court admit *pro hac vice* Michael C. Shepherd (“Visiting Attorney”), an attorney admitted to practice and currently in good standing of the Bar of the Commonwealth of Virginia, the Bar of the State of New York, and the Bar of the State Florida, the U.S. Court of Appeals for the Fourth Circuit, and the U.S. District Court for the Eastern District of Virginia, and qualified to practice in this court, who proposes to act as counsel for Alston & Bird LLP (“Client”), in the case listed above, and in any adversary proceedings therein in which the Visiting Attorney appears on behalf of such Client.

I am aware that the local rules of this court require a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court (“Member-Counsel”) to act as counsel for such Client(s), unless the court specifically authorizes an attorney not so admitted to act as counsel. I understand that Member-Counsel is required to participate in the preparation and presentation of, and accept service of all papers in, the case identified above and any adversary proceedings in which the Visiting Attorney appears on behalf of such Client.

I am a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court to act as Member-Counsel for the above-referenced Client in this case and in any adversary proceedings in this case in which the Visiting Attorney appears on behalf of the Client. I understand that I am required to participate in the preparation and the presentation of the case above and any such adversary proceedings and to accept service of all papers served in such case and proceedings.

The order granting this Motion will serve to admit the Visiting Attorney to practice in the case noted above on behalf of the Client and in any adversary proceedings in that case in which the Visiting Attorney appears on behalf of such Client. I understand that if I decline to serve as Member-Counsel in any such adversary proceeding, separate Member-Counsel must file an additional *Motion to Appear Pro Hac Vice*, and that absent such separate motion and an order of this court approving the same I will continue to act as Member-Counsel for the Client in all such proceedings.

The affidavit of the Visiting Attorney required under Local Rule 2090-1(C)(2) is attached and deemed to be filed concurrently herewith.

WHEREFORE, upon the foregoing representations, Movant respectfully requests an order of this court authorizing the Visiting Attorney to appear *pro hac vice* in this case and in any adversary proceedings in this case on behalf of the Client(s) and indicating Movant as Member-Counsel for the Client, and for such other and further relief as may be just.

Dated: May 21, 2026

Respectfully submitted,

WHITE & CASE LLP

/s/ James N. Robinson

James N. Robinson

Florida Bar No. 608858

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Counsel for Alston & Bird LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 21, 2026, a true and correct copy of the foregoing was served via the Court's electronic case filing system on all of those parties receiving electronic notice in the above-referenced case.

/s/ James N. Robinson

James N. Robinson

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AFFIDAVIT OF PROPOSED VISITING ATTORNEY

I, Michael C. Shepherd, am a member in good standing of the Bar of the Commonwealth of Virginia, the Bar of the State of New York, and the Bar of the State of Florida, the U.S. Court of Appeals for the Fourth Circuit, and the U.S. District Court for the Eastern District of Virginia, but I am not admitted to the bar of the United States District Court for the Southern District of Florida. I certify that I have never been disbarred, that I am not currently suspended from the practice of law in the State of Florida or any other state, and that I am not currently suspended from the practice of law before any United States Court of Appeals, United States District Court, or United States Bankruptcy Court. I certify that I have not filed more than three *pro hac vice* motions in different cases in this District within the last 365 days.

I hereby request authority to appear *pro hac vice* in this case and in any adversary proceedings in this case on behalf of Alston & Bird LLP (“Client”). I designate James N. Robinson, who is a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court (“Member-Counsel”), as Member-Counsel for the Client. I understand that Member-Counsel is required to participate in the preparation and the preparation of the case above and any adversary proceedings in which I appear on behalf of such Client(s), and accept service of all papers served in such case and proceedings, unless and until other Member-Counsel is designated and accepts such designation by filing a separate *Motion to Appear Pro Hac Vice* on my behalf.

I certify that I am familiar with and shall be governed by the Local Rules of this court, the Rules of Professional Conduct and all other requirements governing the professional behavior of members of the Florida Bar.

Dated: May 21, 2026

Respectfully submitted,

WHITE & CASE LLP

/s/ Michael C. Shepherd

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