

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

In re:

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

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

Debtors.

/ Chapter 11

**MOTION TO APPEAR PRO HAC VICE**

Solomon B. Genet (“**Local Counsel**”) moves to admit pro hac vice Jacob R. Friedman (“**Visiting Attorney**”) as counsel for the Debtors Goliath Ventures Inc. (FL) and Goliath Ventures Inc. (WY) (the “**Clients**”), based on the attached Visiting Attorney’s Declaration and the following certifications:

1. Local Counsel is a member in good standing of the bar of the United States District Court for the Southern District of Florida and a registered user of CM/ECF in this Court.

2. Local Counsel will remain responsible for this representation and, even if Visiting Attorney becomes a registered user of CM/ECF, Local Counsel will:

(a) review every document filed with the Court on Clients’ behalf;

(b) include Local Counsel’s signature block – together with Visiting Attorney’s signature block – on every document filed with the Court on Client’s behalf;

(c) unless excused by the Court, attend all hearings that Visiting Attorney attends on Clients’ behalf; and

(d) not withdraw or otherwise cease serving as local counsel for the Clients unless and until successor local counsel has appeared.

WHEREFORE, Local Counsel respectfully requests that the Court admit Visiting Attorney as pro hac vice counsel for the Clients in this case.

By: /s/Solomon B. Genet  
Solomon B. Genet, Esq.  
Florida Bar No. 617911  
[sgenet@melandbudwick.com](mailto:sgenet@melandbudwick.com)  
MELAND BUDWICK, P.A.  
3200 Southeast Financial Center

200 South Biscayne Blvd.  
Miami, Florida 33131  
Telephone: (305) 358-6363  
Facsimile: (305) 358-1221

*Counsel for the Debtors*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served on June 4, 2026, via the Court's Notice of Electronic Filing upon Registered Users listed on the attached **Exhibit 1**.

By: /s/Solomon E. Genet  
Solomon B. Genet, Esq.

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**DECLARATION OF VISITING ATTORNEY**

I, Jacob R. Friedman, Esq. declare as follows:

1. I am a member in good standing of the bar of the following states or federal courts:
  - New York State Bar, Bar No. 5249626
2. I have never been disbarred and am not currently suspended from practicing law in Florida, any other state, or any federal court.
3. I designate Solomon B. Genet as “Local Counsel” for the Debtors Goliath Ventures Inc. (FL) and Goliath Ventures Inc. (WY) (the “*Clients*”).
4. I understand that even if I become a registered user of CM/ECF, Local Counsel must:
  - (a) review every document filed with the Court on Clients’ behalf;
  - (b) include their signature block – together with my signature block – on every document filed with the Court on Clients’ behalf;
  - (c) unless excused by the Court, attend all hearings that I attend on Clients’ behalf; and
  - (d) not withdraw or otherwise cease serving as local counsel for Client unless and until successor local counsel has appeared.
5. I have read and will remain familiar with the Local Rules of the United States Bankruptcy Court for the Southern District of Florida, and I agree to be bound by those rules and by the Rules Regulating the Florida Bar, while appearing in this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 4, 2026  
Date

/s/Jacob R. Friedman  
Visiting Attorney's signature

Jacob R. Friedman, Esq.  
MELAND BUDWICK, P.A.  
3200 Southeast Financial Center  
200 South Biscayne Blvd.  
Miami, Florida 33131  
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**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.

- **Alexander E. Brody** abrody@melandbudwick.com, ltannenbaum@melandbudwick.com;mrbnfs@yahoo.com;ltannenbaum@ecf.courtdrive.com;phornia@ecf.courtdrive.com
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