

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' MOTION TO CONFIRM  
APPLICATION OF FORMER LOCAL RULE 2002-1(H)(2)**

**Relief Requested Without a Hearing**

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 for relief requested without a hearing, pursuant to 11 U.S.C. § 105, L.R. 9013-2, and Administrative Order 2026-01 (“*Motion*”), for the entry of an order confirming application of former Local Rule 2002-1(H)(2) to the above-captioned bankruptcy cases (“*Bankruptcy Cases*”). 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 was held on April 22, 2026 [Dkt. No. 10] and then continued until June 26, 2026.
4. On April 10, 2026, the U.S. Trustee appointed a Committee of Creditors Holding Unsecured Claims [Dkt. No. 63] (the “*Committee*”). The Committee retained Phang & Feldman,

P.A. as their counsel, which was approved at the hearing held on May 28, 2026.

5. The Debtors host the following website <https://www.goliathventuresbk.com/> (“*Case Website*”) to facilitate the dissemination of information to all parties in interest.

6. As of June 1, 2026, 403 proofs of claim have been filed in the lead case, and 175 proofs of claim have been filed in the member case. More claims have been filed since that time. Nearly all of the claimants are victims of an alleged Ponzi scheme perpetrated by an insider of the Debtors.

7. Due to the size of the matrices, on April 14, 2026, the Notice of Filing Consolidated Master Service List was filed pursuant to the *former* Local Rule 2002-1(H)(2). [Dkt. No. 65]. Former Local Rule 2002-1(H) has been removed from the Amended and Restated Local Rules which became effective June 1, 2026. Administrative Order 2026-01 (“*AO*”) states the rules “will govern in all proceedings in bankruptcy cases thereafter commenced, and, insofar as just and practicable, all proceedings then pending.”

8. The Debtors respectfully request confirmation that – given the “just and practicable” language for pending proceedings – former L.R. 2002-1(H)(2), which the Debtors had been properly complying with from the Petition Date until June 1, 2026, applies in this Bankruptcy Case going forward. Former Local Rule 2002-1(H)(2) states as follows:

A party responsible for service may, at the server’s option and in lieu of service on all parties of record, or must, if the court or these rules direct, serve the following parties:

- (a) The U.S. Trustee;
- (b) The debtor;
- (c) The debtor’s attorney;
- (d) Any indenture trustees;
- (e) The members of and attorneys to any official committee established pursuant to 11 U.S.C. §1102, and, before such appointment, the creditors shown on the list required by Bankruptcy Rule 1007(d);
- (f) Creditors holding claims known to be secured by property in which the estate has an interest;

- (g) The United States and its agencies as required by Bankruptcy Rule 2002(j);
- (h) Those parties and attorneys who have formally requested notice by filing with the court and serving upon debtor's attorney a notice of appearance or request for service of notices and papers in the case;
- (i) Any examiner or trustee (and their attorneys) appointed in the case; and
- (j) Any parties and entities (including local governmental units) previously known to the debtor to have a particularized interest in the subject of the notice(s) required to be served.

9. Given the large number of creditors and parties-in-interest in this Bankruptcy Case, service upon all creditors and non-application of the former local rule would be unduly burdensome, costly, and inefficient. This requested relief, i.e., to confirm application of the local rule that was in effect as of the Petition Date, will reduce administrative expenses, avoid duplication of notice, and promote the efficient administration of the bankruptcy estate without materially prejudicing the rights of interested parties. Further, the Debtors' operation of the Case Website, as well as the active role taken and expected to continue by Committee counsel, facilitates expanded notice without much of the accompanying burden.

10. The Debtors submit that the AO's "*just and practicable*" language supports application of the former Local Rule in the instant case for these exact reasons. The Debtors further submit that the requested relief will not result in prejudice to any party in interest.

11. Accordingly, the Debtors respectfully request that the Motion be granted and that this Court confirm application of the former local rule.

12. The Debtors have conferred with (1) the Committee, which **supports** the requested relief; and (2) the Office of the United States Trustee, which has not taken a position at the time of filing this motion.

13. 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)

confirming application of former Local Rule 2002-1(H)(2), 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 June 4, 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 proposed Master Service List attached as Exhibit 2.

Dated: June 4, 2026.

/s/ Solomon B. Genet  
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UNITED STATES BANKRUPTCY COURT  
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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.

\_\_\_\_\_ /

**ORDER GRANTING MOTION TO CONFIRM  
APPLICATION OF FORMER LOCAL RULE 2002-1(H)(2)**

THIS MATTER came before the Court, on relief requested without a hearing, upon the *Debtors' Motion to Confirm Application of Former Local Rule 2002-1(H)(2)* [Dkt. No. \_\_\_\_] (the "*Motion*"), pursuant to 11 U.S.C. § 105, L.R. 9013-2, and Administrative Order 2026-01. The Court, having reviewed the Motion, and finding good cause therefor,

**ORDERS** as follows:

1. The Motion is **GRANTED**.

2. Former Local Rule 2002-1(H)(2) applies in the Bankruptcy Cases (as defined in the Motion).

3. The Clerk of Court is directed to docket a copy of this order in the member case, Case No. 26-13176-RAM.

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**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.

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

**U.S. Trustee:** *(Notice provided via NEF)*

Office of The United States Trustee  
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Miami, FL 33130

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**Debtors-in-Possession:** *(via NEF)*

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Sean O'Neill  
Alan Maza  
Securities & Exchange Commission  
Division of Enforcement  
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**Joint Committee of Creditors:**

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**Notice of Appearances:**  
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