

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

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

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**JOINT MOTION FOR EXTENSION OF TIME TO COMPLY  
WITH THE COURT'S ORDER SETTING DEADLINES FOR OBJECTIONS TO  
MOTION FOR PROTECTIVE ORDER AND RESPONSES THERETO**

*Relief Requested Without a Hearing*

Pursuant to Federal Rules of Bankruptcy Procedure 9006(b) and 9013(b) and Local Rule 9013-2(b), Debtors Goliath Ventures Inc. (FL) and Goliath Ventures Inc. (WY) (together, “*Debtors*”) and JPMorgan Chase, N.A., Bank of America, N.A., Coinbase, Inc., and Coinbase Custody Trust Company, LLC (collectively, the “*Subpoenaed Financial Institutions*”), by and through their undersigned counsel, respectfully move this Court for an order extending the deadlines for the Subpoenaed Financial Institutions to object to the Debtors’ Motion for Entry of Uniform Case Protective Order [Dkt. No. 132] (the “*Motion for Protective Order*”) and for the Debtors to respond to those objections. In support of this Motion, the parties state as follows:

1. On May 20, 2026, the Debtors filed a Motion for Entry of Uniform Case Protective Order [Dkt. No. 132] requesting that the Court enter an order governing treatment of confidential information produced in this case.

2. By Order dated May 21, 2026 [Dkt. No. 135], this Court “determined that a hearing by video conference should be scheduled and deadlines imposed” for any party in interest wishing to respond to the Motion for Protective Order to do so. Accordingly, the Court established a hearing date of July 9, 2026, an objection deadline of June 12, 2026, and a response deadline of

June 26, 2026.

3. The Subpoenaed Financial Institutions are each recipients of Rule 2004 Examination Subpoenas issued by the Debtors and have each asserted confidentiality objections in response to those subpoenas. Each of the Subpoenaed Financial Institutions thus has an interest in the terms of any protective order governing confidential information entered by this Court.

4. Undersigned counsel for the Subpoenaed Financial Institutions and the Debtors have conferred and are continuing to confer on the Debtors' proposed form of uniform case-wide protective order in an attempt to resolve differences and/or narrow the issues that may need to be determined by the Court. The undersigned parties have a reasonable belief that with additional time it may be possible to reach agreement, or at a minimum significantly limit the areas of disagreement.

5. Therefore, the undersigned parties jointly request that the Court extend the deadline for the Subpoenaed Financial Institutions to file objections through and including June 23, 2026 and the deadline to file responses to those objections through and including July 3, 2026. The requested extensions will not impact the July 9, 2026 hearing date.

6. No party will be prejudiced by the requested extensions, which will not result in unreasonable delay.

WHEREFORE, for the foregoing reasons, the Debtors and the Subpoenaed Financial Institutions respectfully request that this Court enter an order in the form attached as **Exhibit A** extending the deadline for the Subpoenaed Financial Institutions to file objections to the Motion for Protective Order to June 23, 2026, and the deadline for the Debtors to respond to such objections to July 3, 2026.

Date: June 11, 2026

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*Attorneys for Coinbase, Inc. and Coinbase Custody Trust  
Company, LLC*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on June 11, 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 11, 2026.

*/s/ Alexander E. Brody*

Alexander E. Brody, Esquire

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

In re:

Chapter 11 Cases

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

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

Debtors.

**ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME TO COMPLY  
WITH THE COURT'S ORDER SETTING DEADLINES FOR OBJECTIONS TO  
MOTION FOR PROTECTIVE ORDER AND RESPONSES THERETO**

THIS matter came before the Court on the *Joint Motion for Extension of Time to Comply With the Court's Order Setting Deadlines for Objections to Motion for Protective Order and Responses Thereto* [Dkt. No. \_\_\_\_\_] (the "**Motion**"). The Court, having reviewed the Motion, and finding good cause therefor,

ORDERS as follows:

1. The Motion is **GRANTED**.
2. Objections by JPMorgan Chase, N.A., Bank of America, N.A., Coinbase, Inc.,

and Coinbase Custody Trust Company, LLC to the Motion for Protective Order [Dkt. No. 132] are due June 23, 2026, and responses thereto are due July 3, 2026.

3. The July 9, 2026 hearing date remains unchanged.

###

Submitted By:

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Copies Furnished To:

Alexander E. Brody, 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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