

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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

**DEBTORS' MOTION TO EXTEND TIME TO FILE
SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS AND OTHER ITEMS**

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***"), by and through undersigned counsel, moves this Court pursuant to F.R.B.P. 1007(c) and L.R. 1007-1(C) ("***Motion***") for the entry of an Order extending the Debtors' deadline to file the following documents: *Summary of Schedules, Schedules A/B and D-H, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, List of Equity Security Holders, and Debtor's Notice of Filing Payroll and Sales Tax Reports* (collectively, the "***Filings***"). 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. *See* 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 ("***Meeting of Creditors***") is scheduled to be held on April 22, 2026 [Dkt. No. 10].

4. Accordingly, the current deadline by which the Debtors must file the Filings is March 30, 2026 (“*Deadline*”).

5. The Debtors do not presently possess adequate information to prepare and submit the Filings. The Debtors are working diligently to obtain that information, specifically, the Debtors’ books and records and server. Therefore, the Debtors request an extension of the Deadline of sixty days through May 30, 2026 (“*Extension*”).

6. The Debtors’ books and records, and server, are in the possession of the United States of America, after having been turned over by Mr. Delgado, the Debtors’ former senior insider, in connection with *U.S.A. v. Delgado*, Case No. 26-1240 (M.D. Fla.). *See* Dkt. No. 11. The Receiver (pre-petition) and the Debtors (post-petition) have requested a duplicate set from the United States. To date, the United States has not agreed to do so.

7. The Debtors continue to engage in discussions with the United States, and if necessary will seek turnover pursuant to Section 542. In the meantime, the Debtors (1) have sought and obtained informal document production from parties including potential victims/creditors; (2) have sought formal document production through F.R.B.P. 2004 from numerous parties, including financial institutions, as reflected on the docket; (3) are monitoring the court filings (including filed proofs of claim) as well as litigation pursued by creditors; and (4) are otherwise taking steps to obtain the information necessary for the Filings.

8. The Debtors submit that granting the Extension will result in no prejudice or harm to any parties in interest.

9. 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) extending the Deadline through and including May 30, 2026, 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 March 27, 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 Court's Matrices in Case No. 26-13174-RAM and Case No. 26-13176-RAM attached as Composite Exhibit 2¹, and VIA email addresses upon the parties listed on Exhibit 3².

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*Attorneys for the Receiver and
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¹ “**ADDL**” means additional parties served. See Exhibit 3.

“**BAD**” means that it is a known bad address; hence, no service by mail.

“**DUP**” means that the address appears more than once on this exhibit and is only being served one time by mail.

“**INC**” means that the Matrix contains an incomplete addresses; hence, no service by mail.

“**NEF**” means that service was made by Notice of Electronic Filing as set forth on Exhibit 1 and is not being additionally served by mail.

“**NNR**” means no notice is required.

“**N-WD**” means no notice required as such party has filed a Notice of Withdrawal with this Court.

“**GVFL**” means that entity appears on both matrices and only being served once.

² See footnote 1.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
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In re:

Chapter 11

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

Debtors.

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

_____ /

**ORDER EXTENDING DEBTORS' DEADLINE TO FILE
SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS AND OTHER ITEMS**

THIS MATTER came before the Court on _____, 2026 at _____.m., upon the *Debtors' Motion to Extend Time to File Schedules, Statement of Financial Affairs and Other Items* [Dkt. No. ____] (the "**Motion**"), pursuant to Federal Rule of Bankruptcy Procedure 1007(c) and Local Rule 1007-1(C). The Motion seeks the entry of an Order extending the Debtors' deadline to file the following documents: *Summary of Schedules, Schedules A/B and D-H, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, List of Equity*

Security Holders, and Debtor's Notice of Filing Payroll and Sales Tax Reports (collectively, the "*Filings*"). The Court, having reviewed the Motion, and finding good cause therefor,

ORDERS as follows:

1. The Motion is **GRANTED**.
2. The Debtors' deadline to file the Filings is extended through and including May 30, 2026.

###

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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Label Matrix for local noticing
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Label Matrix for local noticing
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Southern District of Florida
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Fri Mar 27 08:50:30 EDT 2026

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NEF

ADDITIONAL (ADDL) for both cases: 26-13174 and 26-13176 – Updated March 27, 2026

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