

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

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.

**DEBTORS' MOTION TO AUTHORIZE MELAND BUDWICK, P.A.
TO PAY 1Q26 UNITED STATES TRUSTEE FEES**

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***") (together, "***Debtors***"), by and through undersigned counsel, move this Court ("***Motion***"), pursuant to 11 U.S.C. §§ 105(a) and 364(a) and (b), for the entry of an Order authorizing Meland Budwick, P.A. to advance payment for the Debtors' 1Q26 United States Trustee fees pursuant to 28 U.S.C. § 1930 ("***UST Fees***"). 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. At present, the Debtors have no money, as it appears that all cash was seized prior to the Receiver's appointment by the U.S.A.
4. The Debtors are diligently working to (among other things) recover monies for the estate, which would enable the Debtors to open DIP Operating account(s) and have funds to pay the UST Fees.

5. The Debtors' first Monthly Operating Reports are due by April 21, 2026 for the period March 16 (Petition Date) through March 31, 2026, during which no disbursements will have been made by or on behalf of the Debtors.

6. UST Fees are due by April 30, 2026.

7. UST Fee of \$250 per Debtor will be due on April 30, 2026, totaling \$500.

8. The failure to pay UST Fees could result in a motion to dismiss or convert these cases, which the Debtors submit would be harmful to the estate and the creditor body.

9. Therefore, the Debtors request the Court authorize Meland Budwick, P.A. – the Debtors' proposed counsel – to advance on the Debtors' behalf – \$500 to pay the 1Q26 UST Fees (“*Payment*”). Meland Budwick, P.A. would seek reimbursement as an administrative expense once the Debtors have available funds.

10. The Payment will result in no prejudice or harm to any parties in interest. The Debtors submit that this Court may authorize the Payment under its inherent and equitable powers, as well as under 11 U.S.C. §§ 105(a) and 364(a) and (b) as such relief would be in the best interests of the Debtors and their creditors.

11. A proposed order granting this relief is attached as Exhibit A.

WHEREFORE, the Debtors request the entry of an order: (a) granting this Motion, (b) authorizing Meland Budwick, P.A. to pay the Debtors' 1Q26 UST Fees totaling \$500, and (c) granting such other and further relief that the Court may deem just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

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
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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 GRANTING DEBTORS' MOTION TO AUTHORIZE
MELAND BUDWICK, P.A. TO PAY 1Q26 UNITED STATES TRUSTEE FEES**

THIS MATTER came before the Court on _____, 2026 at _____.m., upon the
Debtors' Motion to Authorize Meland Budwick, P.A. to Pay 1Q26 United States Trustee Fees
[Dkt. No. ____] (the "**Motion**"). The Court, having reviewed the Motion, and finding good cause
therefor,

ORDERS as follows:

1. The Motion is **GRANTED**.
2. Meland Budwick, P.A. is authorized to advance as a reimbursable cost and pay 1Q26 United States Trustee Fee pursuant to 28 U.S.C. § 1930 in the amount of \$250 for each of the two Debtors.

###

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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
113C-1
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Southern District of Florida
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Fri Mar 27 08:49:56 EDT 2026

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Label Matrix for local noticing
113C-1
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NEF

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

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