

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 EXTEND AND RESET THE CLAIMS BAR DATE**

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*”), file this Motion to extend and reset the current claims bar date of May 26, 2026 through and including September 30, 2026, and 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 Receiver caused the Debtors to file their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code, commencing these bankruptcy cases [Dkt. No. 1]. The Chapter 11 petitions only listed twenty-nine (29) creditors which were known at the time.
3. The Bankruptcy Code section 341 Meeting of Creditors (“*Meeting of Creditors*”) is scheduled to be held on April 22, 2026 [Dkt. No. 10]. The Notice of the Meeting of Creditors established May 26, 2026 as the deadline for all creditors (except governmental units) to file a proof of claim (“*Claims Bar Date*”) and September 14, 2026 as the deadline for governmental units to file a proof of claim. [Dkt. No. 10]

4. On March 31, 2026, the Court entered the Amended Order Extending Debtors' Deadline to File Schedules, Statement of Financial Affairs and Other Items [Dkt. No. 57], establishing the current deadline by which the Debtors must file the Filings<sup>1</sup> as May 30, 2026.

5. 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.) ("**Criminal Case**"). See Dkt. No. 11. Prior to the Petition Date, the Receiver requested a duplicate set from the United States. As of the Petition Date, the United States had not agreed to do so.

6. As a result of the limited available information, the Notice of the Meeting of Creditors was served only on a limited number of creditors, i.e., the ones known at the time of the filing of the Debtors' Chapter 11 petitions.

7. Post-petition, the Debtors and the United States have engaged in active discussions about multiple significant issues including turnover of the Debtors' books and records, and server. While an agreement has yet to be reached, the Debtors are optimistic; if an agreement is not reached, the Debtors will seek turnover pursuant to 11 U.S.C. § 542.

8. In the meantime, the Debtors: (1) have obtained informal document production from multiple parties, including potential victims/creditors; (2) have issued (and in some cases obtained) formal document production through F.R.B.P. 2004, including from certain financial institutions and pre-petition professionals; and (3) are monitoring the court filings (including proofs of claim) and litigation pursued by creditors in other courts.

9. However, the Debtors do not yet have adequate information to prepare and submit the Filings.

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<sup>1</sup> As defined in that Order.

10. Once the Debtors file the Filings along with the Local Form “Debtor’s Notice of Compliance with Requirements for Amending Creditor Information,” the Debtors intend to provide notice of their cases and the Claims Bar Date and file a Certificate of Service.

11. Based on the above, the Debtors request the Court enter an Order extending and resetting the Claims Bar Date through and including September 30, 2026 (“*New Claims Bar Date*”).

12. Resetting the Claims Bar Date will benefit creditors who appear to be largely victims of Mr. Delgado’s fraud while not causing prejudice or harm to any parties in interest.

13. A proposed order granting the requested relief is attached as Exhibit A.

**WHEREFORE**, the Debtors request the entry of an order: (a) granting this Motion, (b) extending and resetting the Claims Bar Date through and including September 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 April 14, 2026, via the Court’s Notice of Electronic Filing upon the Registered Users listed on the attached Exhibit 1 and on the Court’s Master Service List pursuant to Local Rule 2002-1(H)(1) attached as Exhibit 2.

Dated: April 14, 2026

/s/ Alexander E. Brody  
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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 DEBTORS' MOTION TO RESET CLAIMS BAR DATE**

THIS MATTER came before the Court on \_\_\_\_\_, 2026, at \_\_\_\_ .m. upon the *Debtors' Motion to Reset Claims Bar Date* [Dkt. No. \_\_\_\_] (the "***Motion***") and, the Court, having reviewed the Motion, hearing arguments of counsel and finding good cause therefor,

**ORDERS** as follows:

1. The Motion is **GRANTED**.
2. The Claims Bar Date shall be reset to \_\_\_\_\_, 2026, for all creditors.

3. The Governmental Claims Bar Date shall remain September 14, 2026.
4. 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:**

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.

- **Alexander E. Brody** abrody@melandbudwick.com,  
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- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov
- **Steven D Schneiderman** Steven.D.Schneiderman@usdoj.gov

**MASTER SERVICE LIST PER LOCAL RULE 2002-1(H)**

**U.S. Trustee:** *(Notice provided via NEF)*  
Office of The United States Trustee  
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Miami, FL 33130

Hannah Watson, AUSA  
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**Debtors-in-Possession:** *(via NEF)*  
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c/o Michael S. Budwick, Receiver  
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Jordan A. Cortez  
Sean O'Neill  
Alan Maza  
Securities & Exchange Commission  
Division of Enforcement  
Miami Regional Office  
801 Brickell Avenue, Suite 1950  
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**Debtor-in-Possession's Attorney:**  
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Alexander E. Brody, Esquire  
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**Joint Committee of Creditors:**  
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**Secured Creditors:**  
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AIS Portfolio Services, LLC  
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**MASTER SERVICE LIST PER LOCAL RULE 2002-1(H)**

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**Notice of Appearances:**

*(Notice provided via NEF  
Upon Registered Users)*

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