

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),

Debtors.

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

EX PARTE MOTION TO MODIFY HEARING DATE AND DEADLINES

Goliath Ventures Inc., a Florida corporation f/d/b/a Gen-Z Venture Firm, Inc. and Goliath Ventures Inc., a Wyoming corporation (together, “*Debtors*”), pursuant to 11 U.S.C. § 105 and F.R.B.P. 2002 and 9006, file this motion (“*Motion*”) to modify the hearing date and deadlines in this Court’s *Order Setting Filing Deadlines and Hearing by Video Conference on Motion to Compromise* [Dkt. No. 92] (“*Hearing and Deadline Order*”). In support, the Debtors state:

1. On April 27, 2026, the Debtors filed their Motion for Approval of Compromise and Settlement with the United States of America: The Coordination Agreement [Dkt. No. 88] (“*Approval Motion*”).

2. On April 30, 2026, this Court entered its Hearing and Deadline Order, setting

- May 19, 2026 as the deadline for any party to object to the Approval Motion;
- June 1, 2026 as the deadline for the Debtors to respond to any such objection; and
- June 4, 2026 at 2:00 p.m. as the hearing date on the Approval Motion.

3. The Receiver will be taking a deposition in Minneapolis on the date of the hearing and a particular Assistant U.S. Attorney who was heavily involved in the Coordination Agreement will be out of the country the week of the hearing and the following week. While the Receiver potentially may be able to participate, the particular Assistant U.S. Attorney would not.

4. Accordingly, for the convenience of the parties and presentation to the Court, the Debtors respectfully request that this Court modify the deadlines and hearing date as follows:

- May 18, 2026 at 12 p.m. as the deadline for any party to object to the Approval Motion;
- May 22, 2026 as the deadline for the Debtors to respond to any such objection; and
- May 28, 2026 as the hearing date on the Approval Motion.¹

5. The Debtors submit that no party will be prejudiced by this requested relief.

6. The United States of America **agrees** to this requested relief.

7. If for any reason the Court declines to grant this requested relief, the Debtors will proceed on the current schedule. Given the significance of the Approval Motion, the Debtors do not request a later date in June.

WHEREFORE, the Debtors respectfully request that this Court enter an Order in substantially the form attached as **Exhibit A**: (i) granting this Motion; and (ii) granting such further relief as this Court deems just and proper.

Dated: May 1, 2026.

Respectfully Submitted,

/s/ Solomon B. Genet
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Attorneys for Debtors

¹ The Debtors checked the Court's on-line calendar, and it appears as if the Court has other hearings at that same day. <https://www.flsb.uscourts.gov/node/123>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on May 1, 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 L.R. 2002-1(H)(1) attached as Exhibit 2.

/s/ Solomon B. Genet
Solomon B. Genet, Esquire

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Chapter 11

GOLIATH VENTURES INC. (FL),
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Case No. 26-13174-RAM
Case No. 26-13176-RAM
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Debtors.

_____ /

**ORDER GRANTING *EX PARTE* MOTION TO MODIFY
HEARING DATE AND DEADLINES**

THIS MATTER having come before the Court upon the *Ex Parte* Motion to Modify Hearing Date and Deadlines [Dkt. No. ____] (“*Motion*”). The Court, having reviewed the Motion and based on the record,

ORDERS as follows:

1. The Motion is **GRANTED**.

2. The Court will conduct a hearing on the Approval Motion on May 28, 2026 at 11:30 a.m. The hearing will be conducted by video conference using the services of Zoom Video Communications, Inc.

3. For instructions regarding the video conference, please refer to the General Procedures for Hearings by Video Conference on Judge Mark's web page on the Court's website, <https://www.flsb.uscourts.gov/judges/judge-robert-mark>

4. To participate in the hearing remotely via Zoom (whether by video or by telephone), you must register in advance no later than 3:00 p.m., one business day before the date of the hearing. To register for the video conference, click on the following link or manually enter the following link in a browser:

<https://www.zoomgov.com/meeting/register/vJIsduqrrTIsGwLENmZWZhscEHry3et9jXQ>

5. Any party objecting to the Approval Motion must file the objection by May 18, 2026 at 12:00 p.m.

6. The Debtors must respond to any objections by May 22, 2026.

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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;mrbnefs@yahoo.com;ltannenbaum@ecf.courtdrive.com;phornia@ecf.courtdrive.com
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MASTER SERVICE LIST PER LOCAL RULE 2002-1(H)

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

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