

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. (WY), Case No. 26-13176-RAM  
Debtor.

**EX PARTE MOTION TO TRANSFER CASE  
TO THE HONORABLE LAUREL M. ISICOFF**

Goliath Ventures Inc., a Wyoming corporation (“*Debtor*”), by and through undersigned counsel, pursuant to F.R.B.P. 1015 and L.R. 1015-1(A)(1), and 1073-1, files this *Ex Parte* Motion to Transfer this case to the Honorable Laurel M. Isicoff (“*Motion*”). In support of this Motion, the Debtor states as follows:

**Jurisdiction**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

**Background**

2. On March 16, 2026 (“*Petition Date*”), the Receiver<sup>1</sup> caused the Debtor to file a voluntary petition under Chapter 11 of the U.S. Bankruptcy Code, along with its affiliate: Goliath Ventures Inc., a Florida corporation, Case No. 26-13176-LMI. The Debtor and its affiliate are collectively referred to as the “*Two Debtors*.”

---

<sup>1</sup> The Receiver is Michael S. Budwick, pursuant to the (1) Amended Order on Plaintiff’s Emergency Verified *Ex Parte* Motion to Appoint a Receiver entered on March 3, 2026 and (2) Agreed Order Granting Receiver’s Agreed Motion to Confirm Receivership Estate Includes Goliath Ventures Inc., a Florida Corporation (f/k/a Gen-Z Venture Firm Inc.); both entered by the Honorable Michael A. Robinson, Circuit Court Judge, in *Patel v. Goliath Ventures Inc.*, Case No. CACE-26-003310, pending in the 17<sup>th</sup> Judicial Circuit in and for Broward County, Florida.

3. The Two Debtors are affiliates. The senior (former) insider of both of the Two Debtors is the same person: Christopher Delgado. The Receiver was appointed as receiver over both of the Two Debtors.

**Basis for Relief**

4. Judicial assignment of bankruptcy cases in the Southern District of Florida is governed under Local Rule 1073-1 (Divisional and Judicial Assignment of Cases). Local Rule 1073-1(B)(3) states “[t]he judge to whom any case or proceeding is assigned may, at any time, reassign the case or proceeding to any other consenting judge in its entirety or for any limited purpose.” *See* Local Rule 1073-1.

5. Local Rule 1015-1, which governs joint administration and intra-district transfer of related cases to one judge, states that “[a] motion for . . . transfer . . . shall be filed by the party seeking . . . transfer of related cases to one judge” and shall state “with particularity why . . . cases for which transfer is sought is or are related to a case or cases before the judge to whom transfer is requested. *See* Local Rule 1015-1 (emphasis supplied).

6. On March 16, 2026, each of the Two Debtors filed voluntary petitions under Chapter 11 of the U.S. Bankruptcy Code and the Debtor seeks to be jointly administered with the Lead Debtor’s case no. as Case No. 26-13174-LMI, before the Honorable Laurel M. Isicoff.

7. Based on the above, the Debtor asserts that it is proper for this case to be transferred to Judge Isicoff. The issues that will be addressed in the Debtor’s case will be related to and overlapping with those in its affiliate’s bankruptcy case. Further, as a general matter, judicial economy, efficiency and uniformity of results will all be achieved if this case and the affiliate case is all before one Bankruptcy Judge.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

8. The Debtors will seek joint administration of the bankruptcy cases.

WHEREFORE, the Debtor respectfully requests entry of an Order transferring this bankruptcy proceeding to the Honorable Laurel M. Isicoff and granting such other and further relief this Court deems fair and equitable.

Dated: March 16, 2026.

s/ Solomon B. Genet  
Solomon B. Genet, Esquire  
Florida Bar No. 617911  
[sgenet@melandbudwick.com](mailto:sgenet@melandbudwick.com)  
MELAND BUDWICK, P.A.  
3200 Southeast Financial Center  
200 South Biscayne Boulevard  
Miami, Florida 33131  
Telephone: (305) 358-6363  
Telecopy: (305) 358-1221

*Proposed Attorneys for  
the Debtors*