UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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In re: Chapter 11

GOLIATH VENTURES INC. (FL), Case No. 26-13174-RAM
GOLIATH VENTURES INC. (WY), Case No. 26-13176-RAM
Jointly Administered

Debtors.
_______________________________/

DEBTORS' MOTION TO EXTEND EXCLUSIVE PERIODS
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES

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 with Goliath WY, the "***Debtors***"), respectfully move for an extension of time through December 31, 2026, within which to file a Chapter 11 plan, and an extension through March 1, 2027, within which to solicit acceptances of such plan ("***Motion***"). In support, the Debtors state:

I. Background

1. On March 3, 2026 and March 5, 2026, the Circuit Court for the 17th Judicial Circuit in and for Broward County, Florida entered orders appointing Michael S. Budwick as the receiver ("***Receiver***") of the Debtors.

2. On March 16, 2026 ("***Petition Date***"), the Receiver caused the Debtors to file voluntary petitions under Chapter 11 of the U.S. Bankruptcy Code in the U.S. Bankruptcy Court S.D. of Florida ("***Bankruptcy Court***") commencing the above-captioned bankruptcy cases.

3. On March 17, 2026, the Court entered its Order Granting Motion for Joint Administration and Granting Motion to Transfer Case, as Modified. [Dkt. No. 7].

4. The Debtors are managing their affairs as debtors in possession pursuant to 11

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U.S.C. §§ 1107(a) and 1108.

5. On March 19, 2026, the Debtors filed their Consolidated Case Management Report [Dkt. No. 11].

6. On March 20, 2026, the Bankruptcy Court entered its Interim Order Granting Receiver's Motion to Excuse Compliance with 11 U.S.C. § 543 [Dkt. No. 31], which, on an interim basis, excused the Receiver from compliance with 11 U.S.C. §§ 543(a)-(b). On April 22, 2026, the Bankruptcy Court conducted a hearing and excused the Receiver from compliance and turnover through August 21, 2026 [Dkt. No. 90].

II. <u>Basis for Relief Requested</u>

7. Section 1121(b) of the Bankruptcy Code provides for an initial period of 120 days after the commencement of a Chapter 11 case during which a debtor has the exclusive right to file a Chapter 11 plan ("***Exclusive Filing Period***"). Section 1121(c)(3) of the Bankruptcy Code provides that if a debtor files a plan within the Exclusive Filing Period, it has a period of 180 days after the commencement of the case to obtain acceptances of such plan, during which time competing plans may not be filed ("***Exclusive Solicitation Period***," and together with the Exclusive Filing Period, the "***Exclusive Periods***"). The Debtors' initial Exclusive Filing Period is currently set to expire on July 14, 2026. The Debtors' Exclusive Solicitation Period is currently set to expire on September 12, 2026.

8. Where the initial 120-day and 180-day exclusive periods provided for in the Bankruptcy Code prove to be unworkable, Section 1121(d) of the Bankruptcy Code allows the bankruptcy court to extend the Exclusive Periods for cause.

> [O]n request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.

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9. However, the 120-day period "may not be extended beyond a date that is 18 months after the [commencement] date" and the 180-day period "may not be extended beyond a date that is 20 months after the [commencement] date." 11 U.S.C. § 1121(d)(2).

10. Congress incorporated the Exclusive Periods into the Bankruptcy Code to afford a debtor a full and fair opportunity to propose a consensual plan and solicit acceptance of such plan without the disruption that might be caused by the filing of competing plans by non-debtors. Indeed, a key objective of Chapter 11 is the formulation, confirmation, and consummation of a consensual plan, and it is the Debtors' intention to achieve this objective.

11. Here, the Debtors submit that ample cause exists to extend the Exclusive Periods in the Debtors' Chapter 11 cases. To begin, the Receiver was appointed pre-petition and quickly caused the Debtors to file for bankruptcy protection, making the determination that filing was in the best interests of creditors. The Receiver considered, among other things, the allegations by civil litigation plaintiffs as well as the United States of America that Mr. Delgado perpetrated a massive Ponzi scheme through and upon the Debtors.[1] Further, the Debtors' investigation (which is still in its early stages) has revealed a large number of money transfers to a wide range of individuals and entities. The Debtors have hired a forensic accountant to assist in understanding the sources and uses of monies. [Dkt. No. 153].

12. Further, "cause" also includes that (i) the Debtors have focused on, and successfully achieved, an agreement with the United States of America (i.e., the Coordination Agreement [Dkt. No. 88]), which provides a roadmap for the Debtors' work with the United States, as the United States continues its criminal and forfeiture investigation / proceedings; (ii) the Debtors have not yet received a duplicate copy of the Debtors' books and records, and server,

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[1] *See, e.g.*, *U.S.A. v. Delgado*, Case No. 26-1240 (M.D. Fla.).

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from the United States (although the Debtors have obtained meaningful information through R. 2004 and other means); (iii) the Debtors are working with the Official Committee of Unsecured Creditors ("***Committee***"); (iv) the Debtors filed their motion to extend time to file schedules, statement of financial affairs, and other items, which was granted by this Court [Dkt. Nos. 57 and 154]; and (v) the proof of claim deadline has been extended through September 30, 2026. [Dkt. No. 89].

13. The Debtors are not seeking to use exclusivity to pressure creditors into accepting a plan they find unacceptable.

14. The Debtors submit that granting the requested relief will result in no prejudice or harm to any parties in interest.

15. The Debtors have conferred with (1) the Committee and anticipate that the Committee will advise at its earliest opportunity as to whether it consents to the requested relief; and (2) the Office of the U.S. Trustee, which does not have a position at the present time.

16. The Debtors submit that an extension of the Exclusive Periods is warranted and appropriate. The requested relief will afford the Debtors a full and fair opportunity to negotiate, propose, and seek acceptance of a confirmable Chapter 11 plan.

17. A proposed order granting the relief sought herein is attached as Exhibit A.

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WHEREFORE, the Debtors request the entry of an order: (a) granting this Motion, (b) granting an extension of time through December 31, 2026, within which to file a Chapter 11 plan, and an extension through March 1, 2027, within which to solicit acceptances of such plan, and (c) granting such other and further relief that the Court may deem just and proper.

Dated: June 18, 2026.

/s/ *Alexander E. Brody*
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Attorneys for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on June 18, 2026, via the Court's Notice of Electronic Filing upon the Registered Users listed on the attached Exhibit 1, and on the Master Service List pursuant to the Order Granting Motion to Confirm Application of Former Local Rule 2002-1(H)(2) [Dkt. No. 164] attached as Exhibit 2.

/s/ *Alexander E. Brody*
Alexander E. Brody, Esquire

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
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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 EXTEND EXCLUSIVE PERIODS
<u>TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES</u>

THIS MATTER came before the Court on ________, 2026, at ___ ___.m. upon the *Debtors' Motion to Extend Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances* [Dkt. No. ___] ("***Motion***") and, the Court, having reviewed the Motion, hearing arguments of counsel, and finding good cause therefor,

ORDERS as follows:

EXHIBIT A

1. The Motion is **GRANTED**.

2. The Debtors' exclusive period within which to file a Chapter 11 plan is extended through and including December 31, 2026, and the Debtors' exclusive period within which to solicit acceptances of such plan is extended through and including March 1, 2027.

3. The Clerk of Court is directed to docket a copy of this Order in 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.

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EXHIBIT 1

CONSOLIDATED MASTER SERVICE LIST

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Debtors-in-Possession: *(via NEF)*
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Miami, Florida 33131

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EXHIBIT 2

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