

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 FOR AUTHORITY
TO USE A SINGLE DEBTOR-IN-POSSESSION OPERATING
ACCOUNT FOR BOTH JOINTLY ADMINISTERED ESTATES**

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**"), pursuant to 11 U.S.C. §§ 105(a) and 345, this Court's equitable power, and F.R.B.P. 2002, respectfully move this Court for entry of an order authorizing the Debtors to maintain all estate funds in a single debtor-in-possession operating account maintained in the name of Goliath WY. In support thereof, the Debtors state as follows:

JURISDICTION

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. 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.

5. 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.

6. 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].

7. Goliath FL does not utilize its prepetition operating account¹ and Goliath WY opened a debtor-in-possession operating account at Wells Fargo (the “**DIP Account**”).

8. Goliath FL has been administratively inactive for more than 120 days prior to the Petition Date. As a result, Wells Fargo (and other banking institutions) contacted by the Debtors have declined to open a separate debtor-in-possession account for Goliath FL notwithstanding the pendency of this Chapter 11 case.

9. The Debtors have made diligent efforts to establish a separate debtor-in-possession account for Goliath FL but have been unable to do so due to banking restrictions applicable to inactive entities.

RELIEF REQUESTED

10. The Debtors seek authority to deposit all receipts and other estate funds attributable to either Debtor into the DIP Account maintained by Goliath WY, subject to the safeguards described herein.

11. The Debtors further request authority to pay any authorized disbursements for either estate from the DIP Account.

BASIS FOR RELIEF

12. Section 345 of the Bankruptcy Code requires that estate funds be protected and

¹ These are under the control of the United States of America. *See* Dkt. No. 155; *see also* *U.S.A. v. Delgado*, Case No. 26-1240 (M.D. Fla.); *U.S.A. v. Assets Identified in Paragraph One of Verified Complaint*, 26-01134 (M.D. Fla.).

maintained in an authorized depository.

13. The DIP Account is maintained at Wells Fargo, which is an approved depository institution that complies with the requirements of the U.S. Trustee Program.

14. Requiring Goliath FL to maintain a separate debtor-in-possession account is presently impracticable because banking institutions have refused to establish such an account due to the entity's inactive status.

15. Use of the single DIP Account will not prejudice creditors of either estate because the Debtors will maintain accurate records that identify:

- All receipts and their source, so each can be attributed to a particular Debtor;
- All disbursements and their basis, so each can be attributed to each particular Debtor;
- Monthly cash balances attributable to each estate to the extent knowable; and
- All transactions necessary to prepare separate monthly operating reports for each Debtor.

16. The Debtors will maintain accounting records sufficient to trace all funds belonging to each Debtor and determine the cash position of each Debtor at all times.

17. The Debtors will continue to file separate monthly operating reports and otherwise comply with all reporting requirements imposed by the Bankruptcy Code, Bankruptcy Rules, and the Office of the U.S. Trustee.

18. The requested relief is administrative in nature, consistent with the Bankruptcy Code, within this Court's equitable authority² including under 11 U.S.C. § 105(a), and will facilitate the efficient administration of these jointly administered estates.

² See generally *In re Little*, 2024 WL 5182324, *2 (Bankr. D.S.C. Dec. 19, 2024) ("The equitable origins of the bankruptcy power suggest substantial leeway to tailor solutions to meet the diverse problems facing bankruptcy courts. Section 105 gives the bankruptcy court the power to fill in gaps and further the statutory mandates of Congress in an efficient manner.") (internal quotations omitted); *In re Trokie*, 590 B.R. 663, 673 (Bankr. M.D. Pa. 2018).

19. The Debtors have conferred with (1) the Committee and anticipate that the Committee will advise at its earliest opportunity as to whether it supports the requested relief; and (2) the Office of the U.S. Trustee which takes no position on the requested relief at this time, but has communicated that if the motion is granted, it should be without prejudice to any effort to modify the relief in the future.

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

WHEREFORE, the Debtors request the entry of an order: (a) granting this Motion, (b) authorizing the Debtors to deposit and maintain all estate funds in a single debtor-in-possession operating account maintained in the name of Goliath WY as set forth herein, 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
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GOLIATH VENTURES INC. (FL),
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Case No. 26-13174-RAM
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Jointly Administered

Debtors.

_____ /

**ORDER GRANTING DEBTORS' MOTION FOR AUTHORITY TO USE
A SINGLE DEBTOR-IN-POSSESSION OPERATING ACCOUNT
FOR BOTH JOINTLY ADMINISTERED ESTATES**

THIS MATTER came before the Court on July ___, 2026, at ___ .m. upon the *Debtors' Motion for Authorizing the Use of a Single Debtor-In-Possession Operating Account for Both Jointly Administered Estates* [Dkt. No. ___] (the "***Motion***"). The Court, having reviewed the Motion and hearing argument of counsel, and finding good cause therefor,

ORDERS as follows:

1. The Motion is **GRANTED**.

2. The Debtors are authorized to maintain all estate funds in a single debtor-in-possession operating account maintained in the name of Goliath WY.

3. The Debtors shall maintain accurate records that identify:

a) All receipts and their source, so each can be attributed to a particular Debtor;

b) All disbursements and their basis, so each can be attributed to each particular Debtor;

c) Monthly cash balances attributable to each estate to the extent knowable; and

d) All transactions necessary to prepare separate monthly operating reports for each Debtor.

4. The Debtors shall maintain accounting records sufficient to trace all funds belonging to each estate and determine the cash position of each Debtor at all times.

5. The Debtors shall continue to file separate monthly operating reports and otherwise comply with all reporting requirements imposed by the Bankruptcy Code, Bankruptcy Rules, and the Office of the U.S. Trustee.

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6. 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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CONSOLIDATED MASTER SERVICE LIST

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Miami, FL 33130

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