

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

In re:

GOLIATH VENTURES INC. (FL),
GOLIATH VENTURES INC. (WY),

Debtors.

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

Chapter 11

MOTION TO APPEAR PRO HAC VICE

Michael B. Green (“Local Counsel”) moves to admit pro hac vice Elizabeth L. McKeen (“Visiting Attorney”) as counsel for Bank of America, N.A. (“Client”), based on the attached Visiting Attorney’s Declaration and the following certifications:

1. Local Counsel is a member in good standing of the bar of the United States District Court for the Southern District of Florida and a registered user of CM/ECF in this Court.

2. Local Counsel will remain responsible for this representation and, even if Visiting Attorney becomes a registered user of CM/ECF, Local Counsel will:

- (a) review every document filed with the Court on Client’s behalf;
- (b) include Local Counsel’s signature block – together with Visiting Attorney’s signature block – on every document filed with the Court on Client’s behalf;
- (c) unless excused by the Court, attend all hearings that Visiting Attorney attends on Client’s behalf; and
- (d) not withdraw or otherwise cease serving as local counsel for Client unless and until successor local counsel has appeared.

WHEREFORE, Local Counsel respectfully requests that the Court enter an Order (attached hereto) admitting Visiting Attorney as pro hac vice counsel for Client in this case.

Date: June 23, 2026

Respectfully submitted,

/s/ Michael B. Green

GUNSTER

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Attorneys for Bank of America, N.A.

CERTIFICATE OF SERVICE

I certify that on June 23, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which caused it to be served electronically on all counsel or parties of record on the Service List below.

/s/ Michael B. Green
Michael B. Green

SERVICE LIST

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DECLARATION OF VISITING ATTORNEY

I, Elizabeth L. McKeen, declare as follows:

1. I am a member in good standing of the bar of the following states or federal courts:
 - State of California
 - U.S. District Court for the Central District of California
 - U.S. District Court for the Eastern District of California
 - U.S. District Court for the Northern District of California
 - U.S. District Court for the Southern District of California
 - U.S. District Court for the District of Colorado
 - U.S. District Court for the Northern District of Illinois
 - U.S. District Court for the Eastern District of Texas
 - U.S. Court of Appeals for the First Circuit
 - U.S. Court of Appeals for the Second Circuit
 - U.S. Court of Appeals for the Third Circuit
 - U.S. Court of Appeals for the Fourth Circuit
 - U.S. Court of Appeals for the Fifth Circuit
 - U.S. Court of Appeals for the Sixth Circuit
 - U.S. Court of Appeals for the Seventh Circuit
 - U.S. Court of Appeals for the Ninth Circuit
 - U.S. Court of Appeals for the Tenth Circuit
 - U.S. Court of Appeals for the Eleventh Circuit
2. I have never been disbarred and am not currently suspended from practicing law in Florida, any other state, or any federal court.

3. I designate Michael B. Green as “Local Counsel” for Bank of America, N.A. (“Client”).
4. I understand that even if I become a registered user of CM/ECF, Local Counsel must:
 - (a) review every document filed with the Court on Client’s behalf;
 - (b) include their signature block – together with my signature block – on every document filed with the Court on Client’s behalf;
 - (c) unless excused by the Court, attend all hearings that I attend on Client’s behalf; and
 - (d) not withdraw or otherwise cease serving as local counsel for Client unless and until successor local counsel has appeared.
5. I have read and will remain familiar with the Local Rules of the United States Bankruptcy Court for the Southern District of Florida, and I agree to be bound by those rules and by the Rules Regulating the Florida Bar, while appearing in this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 23, 2026

/s/ Elizabeth L. McKeen
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ORDER ADMITTING ATTORNEY PRO HAC VICE

Upon consideration of the motion (Dkt. No. __) filed by Michael B. Green (“Local Counsel”) seeking to admit pro hac vice Elizabeth L. McKeen (“Visiting Attorney”) as counsel for Bank of America, N.A. (“Client”), together with the Visiting Attorney’s declaration, it is

ORDERED that:

1. The motion is **GRANTED**.
2. Elizabeth L. McKeen is admitted pro hac vice to practice in this Court in this case, any related jointly administered case, and any related adversary proceeding, on behalf of Bank of America, N.A.

3. Visiting Attorney may apply to become a registered user of CM/ECF in accordance with applicable CM/ECF procedures.
4. Whether or not Visiting Attorney becomes a registered user of CM/ECF, Local Counsel must:
 - (a) review every document filed with the Court on Client's behalf;
 - (b) include their signature block – together with the signature block of Visiting Attorney – on every document filed with the Court on Client's behalf;
 - (c) unless otherwise ordered, attend all hearings that Visiting Attorney attends on Client's behalf; and
 - (d) not withdraw or otherwise cease serving as local counsel for Client unless and until successor local counsel has appeared.

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Submitted by:

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Copies furnished to all parties of record via CM/ECF.