

**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 Pamela A. Miller (“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

George S. LeMieux
Florida Bar No. 16403
glemieux@gunster.com
Michael B. Green
Florida Bar No. 87571
mgreen@gunster.com
Becky N. Saka
Florida Bar No. 1010315
bsaka@gunster.com
600 Brickell Avenue, Suite 3500
Miami, FL 33131
Telephone: (305) 376-6000
Facsimile: (305) 376-6010

O'MELVENY & MYERS LLP

Pamela A. Miller (*pro hac vice admission pending*)
New York Bar No. 2912194
pmiller@omm.com
Lauren M. Wagner (*pro hac vice admission pending*)
New York Bar No. 5430640
lwagner@omm.com
1301 Avenue of the Americas, Suite 1700
New York, NY 10019
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

Elizabeth L. McKeen (*pro hac vice admission pending*)
California Bar No. 216690
emckeen@omm.com
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
Telephone: (949) 823-6900
Facsimile: (949) 823-6994

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

Alexander E. Brody Solomon B. Genet MELAND BUDWICK, P.A. 3200 Southeast Financial 200 South Biscayne Boulevard Miami, FL 33131 Telephone: (305) 358-6363 abrody@melandbudwick.com sgenet@melandbudwick.com <i>Counsel for Debtor Goliath Ventures Inc.</i>	Jonathan S. Feldman PHANG & FELDMAN, P.A. 2 S. Biscayne Boulevard, Suite 1600 One Biscayne Tower Miami, FL 33131 Telephone: (305) 614-1223 feldman@katiephang.com service@katiephang.com <i>Counsel for Creditor Committee of Unsecured Creditors and Creditor Todd Rideman</i>
Matthew M. Graham Jason P. Hernandez STEARNS WEAVER MILLER WEISSLER ALHADEFF & SITTERSON, P.A. 150 West Flagler Street, Suite 2200 Miami, FL 33130 Telephone: (305) 789-3200 mgraham@stearnsweaver.com jhernandez@stearnsweaver.com <i>Counsel for Coinbase, Inc. and Coinbase Custody Trust Company, LLC</i>	James N. Robinson WHITE & CASE LLP Southeast Financial Center, Suite 4900 200 South Biscayne Boulevard Miami, FL 33131 Telephone: (305) 371-2700 jrobinson@whitecase.com <i>Counsel for Interested Party Alston & Bird LLP</i>
Elizabeth R. Brusa SHUMAKER, LOOP & KENDRICK, LLP 101 East Kennedy Boulevard, Suite 2800 Tampa, FL 33602 Telephone: (813) 229-7600 ebrusa@shumaker.com mkulczycke@shumaker.com <i>Counsel for Creditor Patrick Justin Renwald</i>	Jeffrey Sonn SONN LAW GROUP P.A. 19495 Biscayne Boulevard, Suite 607 Aventura, FL 33180 Telephone: (305) 912-3000 jsonn@sonnlaw.com <i>Counsel for Creditor John Euliano</i>

Daniel M. Coyle Noah M. Rosenblum SEQUOR LAW, P.A. 1111 Brickell Avenue, Suite 1250 Miami, FL 33131 Telephone: (305) 372-8282 dcoyle@sequorlaw.com nrosenblum@sequorlaw.com <i>Counsel for Creditor James Deppoleto</i>	Kimberly H. Israel KAUFMAN DOLOWICH 301 E. Pine Street, Suite 1150 Orlando, FL 32801 Telephone: (407) 358-5619 kim.israel@kaufmandolowich.com natalie.nunley@kaufmandolowich.com <i>Counsel for Creditor Dr. Royce McGowan</i>
Kelly Roberts ROBERTS LAW, PLLC 2075 Main Street, Suite 23 Sarasota, FL 34237 Telephone: (941) 444-9783 kelly@kellyrobertslaw.com <i>Counsel for Creditor Robert R. Wilberding</i>	Christian Somodevilla Assistant United States Attorney U.S. Attorney's Office – Southern District of Florida 99 N.E. 4th Street, Suite 300 Miami, FL 33132 Telephone: (305) 961-9092 christian.somodevilla@usdoj.gov <i>Counsel for Creditor United States of America – Internal Revenue Service</i>
Steven D. Schneiderman Office of the U.S. Trustee 51 S.W. 1 Ave. #1204 Miami, FL 33130 Telephone: (305) 536-7285 Steven.d.schneiderman@usdoj.gov <i>Counsel for the U.S. Trustee</i>	

**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

DECLARATION OF VISITING ATTORNEY

I, Pamela A. Miller, declare as follows:

1. I am a member in good standing of the bar of the following states or federal courts:
 - State of New York
 - U.S. District Court for the Northern District of New York
 - U.S. District Court for the Southern District of New York
 - U.S. District Court for the Western District of New York
 - U.S. District Court for the Eastern District of New York
 - U.S. Court of Appeals for the Second Circuit
 - U.S. Court of Appeals for the Fifth Circuit
 - U.S. Court of Appeals for the Ninth Circuit
 - U.S. Supreme Court
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/ Pamela A. Miller

O’MELVENY & MYERS LLP

Pamela A. Miller

New York Bar No. 2912194

pmiller@omm.com

1301 Avenue of the Americas, Suite 1700

New York, NY 10019

Telephone: (212) 326-2000

Facsimile: (212) 326-2061

**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

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 Pamela A. Miller (“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. Pamela A. Miller 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.

#

Submitted by:

Michael B. Green, Esq.

GUNSTER

600 Brickell Avenue, Suite 3500

Miami, FL 33131

Telephone: (305) 376-6000

mgreen@gunster.com

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