

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

In re:

Chapter 11 Cases

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

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

Debtors.

Jointly Administered

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO COMPLY
WITH THE COURT’S ORDER SETTING DEADLINES FOR OBJECTIONS TO
MOTION FOR PROTECTIVE ORDER AND RESPONSES THERETO**

Relief Requested Without a Hearing

Pursuant to Federal Rules of Bankruptcy Procedure 9006(b) and 9013(b) and Local Rule 9013-2(b), Debtors Goliath Ventures Inc. (FL) and Goliath Ventures Inc. (WY) (together, “**Debtors**”) and JPMorgan Chase Bank, N.A., Bank of America, N.A., Coinbase, Inc., and Coinbase Custody Trust Company, LLC (collectively, the “**Subpoenaed Financial Institutions**”), by and through their undersigned counsel, respectfully move this Court for an order extending the deadlines for the Subpoenaed Financial Institutions to object to the Debtors’ Motion for Entry of Uniform Case Protective Order [Dkt. No. 132] (the “**Motion for Protective Order**”) and for the Debtors to respond to those objections. In support of this Motion, the parties state as follows:

1. On May 20, 2026, the Debtors filed a Motion for Entry of Uniform Case Protective Order [Dkt. No. 132] requesting that the Court enter an order governing treatment of confidential information produced in this case.

2. By Order dated May 21, 2026 [Dkt. No. 135], this Court “determined that a hearing by video conference should be scheduled and deadlines imposed” for any party in interest wishing to respond to the Motion for Protective Order to do so. Accordingly, the Court established a hearing date of July 9, 2026, an objection deadline of June 12, 2026, and a response deadline of

June 26, 2026.

3. By Order dated June 12, 2026 [Dkt. No. 178], this Court granted an extension of the deadline for the Subpoenaed Financial Institutions to file objections through and including June 23, 2026 and the deadline to file responses to those objections through and including July 3, 2026.

4. The Subpoenaed Financial Institutions are each recipients of Rule 2004 Examination Subpoenas issued by the Debtors and have each asserted confidentiality objections in response to those subpoenas. Each of the Subpoenaed Financial Institutions thus has an interest in the terms of any protective order governing confidential information entered by this Court.

5. Undersigned counsel for the Subpoenaed Financial Institutions and the Debtors have conferred and are continuing to confer on the Debtors' proposed form of uniform case-wide protective order in an attempt to resolve differences and/or narrow the issues that may need to be determined by the Court. The undersigned parties have already narrowed some of their disputes through meeting and conferring, and have a reasonable belief that with additional time it may be possible to reach agreement, or at a minimum significantly limit the areas of disagreement.

6. Therefore, the undersigned parties jointly request that the Court extend the deadline for the Subpoenaed Financial Institutions to file objections through and including June 25, 2026 and the deadline to file responses to those objections through and including July 6, 2026. The requested extensions will not impact the July 9, 2026 hearing date.

7. No party will be prejudiced by the requested extensions, which will not result in unreasonable delay.

WHEREFORE, for the foregoing reasons, the Debtors and the Subpoenaed Financial Institutions respectfully request that this Court enter an order in the form attached as **Exhibit A**

extending the deadline for the Subpoenaed Financial Institutions to file objections to the Motion for Protective Order to June 25, 2026, and the deadline for the Debtors to respond to such objections to July 6, 2026.

Date: June 23, 2026

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***Attorneys for Coinbase, Inc. and Coinbase Custody Trust
Company, LLC***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on June 23, 2026, via the Court's Notice of Electronic Filing upon the Registered Users listed on the attached Exhibit 1, via U.S. Mail upon the parties listed on the proposed Master Service List attached as Exhibit 2.

Dated: June 23, 2026.

/s/ Michael B. Green
Michael B Green, Esq.

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

In re:

Chapter 11 Cases

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

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

**[PROPOSED] ORDER GRANTING SECOND JOINT MOTION
FOR EXTENSION OF TIME TO COMPLY WITH THE
COURT’S ORDER SETTING DEADLINES FOR OBJECTIONS TO
MOTION FOR PROTECTIVE ORDER AND RESPONSES THERETO**

THIS CAUSE is before the Court on the Joint Motion for Extension of Time to Comply With the Court’s Order Setting Deadlines for Objections to Motion for Protective Order and Responses Thereto (the “Motion”), filed on June 23, 2026. Having reviewed the Motion and being fully advised in its premises, it is hereby

ORDERED AND ADJUDGED that the Motion [Dkt. No. __] is **GRANTED**. Objections by JPMorgan Chase, N.A., Bank of America, N.A., Coinbase, Inc., and Coinbase Custody Trust

EXHIBIT A

Company, LLC to the Motion for Protective Order [Dkt. No. 132] are due June 25, 2026, and responses thereto are due July 6, 2026. The July 9, 2026 hearing date remains unchanged.

DONE AND ORDERED in Chambers at Miami, Florida, on this ____ day of June, 2026.

ROBERT A. MARK
UNITED STATES BANKRUPTCY JUDGE

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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