

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL  
CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA

GOLIATH VENTURES, INC.,

CASE NO.: 2025-CA-009246-O

Plaintiff,

v.

DANNY DE HEK,

Defendant.

**SUMMONS**

PERSONAL SERVICE ON A NATURAL PERSON

**TO EACH SHERIFF OF THE STATE:** You are commanded to serve this Summons and a copy of the Complaint in this action on Defendant:

Danny De Hek

**IMPORTANT**

A lawsuit has been filed against you. You have twenty (20) calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court, you must also mail or take a copy of your written response to the "Counter-Plaintiff/ Counter-Plaintiff's Attorney" named below.

Oliver Birman, Esq.  
Plaintiff/Plaintiff's Attorney

Perlman, Bajandas, Yevoli & Albright  
200 S. Andrews Avenue, Suite 600  
Fort Lauderdale, Florida 33301

Dated on: 9/30/25



Tiffany Moore Russell, Clerk of Courts  
*/s/ Brian Williams*  
Deputy Clerk  
**Civil Division**  
425 N Orange Ave  
Room 350  
Orlando, FL 32801

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**Plaintiff's Initial Disclosures**

Plaintiff, Goliath Ventures, Inc ("Goliath"), pursuant to Florida Rule of Civil Procedure 1.280, hereby provide their Initial Disclosures for this action.

**I. Individuals with Discoverable Information (Fla. R. Civ. P. 1.280(a)(1)(A))**

**1. Chris Delgado**

**Address:** c/o Perlman Bajandas Yevoli & Albright P.L., Attention Oliver Birman and David Robbins, 200 S. Andrews Avenue, Suite 600, Fort Lauderdale, FL 33301

**Telephone:** (954) 566-7117

**Email:** [obirman@pbyalaw.com](mailto:obirman@pbyalaw.com); [drobbins@pbyalaw.com](mailto:drobbins@pbyalaw.com); [jbordner@pbyalaw.com](mailto:jbordner@pbyalaw.com)

**Subjects of Information:** Mr. Delgado has knowledge regarding the formation, operations, and business model of Goliath Ventures, Inc., including its investment strategies, client engagement practices, compliance protocols, and marketing initiatives. He is familiar with the company's cryptocurrency-related activities, including liquidity pool provisioning, mining operations, and partnerships. Mr. Delgado also has direct knowledge of the defamatory statements made by Defendant Danny De Hek, the impact of those statements on Goliath and its clients, and the resulting reputational and economic harm. In addition, he is familiar with Goliath's business relationships, contractual arrangements, and investor relations, including any communications with third parties regarding Defendant's accusations.

**2. Corporate Representative of Goliath Ventures, Inc.**

**Address:** c/o Perlman Bajandas Yevoli & Albright P.L., Attr: Oliver Birman and David Robbins, 200 S. Andrews Avenue, Suite 600, Fort Lauderdale, FL 33301

**Telephone:** (954) 566-7117

**Email:** [obirman@pbyalaw.com](mailto:obirman@pbyalaw.com); [drobbins@pbyalaw.com](mailto:drobbins@pbyalaw.com); [jbordner@pbyalaw.com](mailto:jbordner@pbyalaw.com)

**Subjects of Information:** The corporate representative of Goliath Ventures, Inc.