

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

GOLIATH VENTURES, INC.,

Plaintiff,

v.

DANNY DE HEK,

Defendant.

CASE NO.: 2025-CA-009246-O

Joint Case Management Report

The Parties submit this Joint Case Management Report pursuant to this Court's October 30, 2025 *Order Setting Case Management Conference* and Fla. R. Civ. P. 1.200(a).

1. A brief factual statement of the case

Goliath brings this action against De Hek arising out of De Hek's publication and promotion of online content about Goliath and its CEO, Chris Delgado. Goliath alleges that De Hek disseminated numerous posts, articles, and videos (including on LinkedIn and YouTube) accusing Goliath of being a fraud and a "Ponzi scheme." Goliath further alleges that De Hek disregarded information

contrary to his narrative, claimed credit for interfering with Goliath's business, and caused reputational and economic harm. Based on these allegations, Goliath asserts claims for defamation per se, defamation by implication, and tortious interference with business relationships.

2. pleading issues, including service of process, venue, joinder of additional parties, theories of liability, damages claimed, and applicable defenses

De Hek has been served with the Complaint and has appeared pro se. Goliath served De Hek in New Zealand on October 10, 2025. De Hek has moved to dismiss, challenging personal jurisdiction and the sufficiency of service. There is currently no answer or affirmative defenses filed. Goliath has opposed the motion to dismiss and requested oral argument and De Hek opposes that request.

Venue is alleged to be proper in Orange County, Florida the place where the defamatory statements were accessed. No additional parties have been joined or appear to be joined. Goliath asserts claims for defamation per se, defamation by implication, and tortious interference, and seeks damages for reputational and related economic harm

3. The identity and number of any motions to dismiss or other preliminary or pre-discovery motions which have been filed and the time period in which they shall be filed, briefed and argued

- De Hek filed a Motion to Dismiss Plaintiff's Complaint on October 20, 2025.
- Goliath filed its Response to the Motion to Dismiss on November 12, 2025.

- Goliath also filed a Motion for Oral Argument on December 8, 2025, requesting that the Court set a hearing on the motion to dismiss and Defendant opposes the request. No hearing has yet been set on the Motion to Dismiss.

4. A discovery plan and schedule including the length of the discovery period, the anticipated number of fact and expert depositions to be permitted and, as appropriate, the length and sequence of such depositions

The parties propose a phased discovery plan, with fact discovery to be completed within 8 months after entry of the Case Management Order (or after the Court rules on the pending motion to dismiss, if the Court prefers), followed by a 60-day expert discovery period.

Discovery will proceed in this sequence: (i) written discovery (interrogatories, requests for production, and subpoenas to third parties) served promptly at the outset of fact discovery; (ii) rolling document production and targeted follow-up written discovery; (iii) fact depositions after the substantial completion of core productions; and (iv) expert disclosures and expert depositions during the expert discovery window.

As to depositions, the parties anticipate approximately 8 fact depositions total (including party representatives and third-party witnesses) and 2-4 expert depositions total, depending on whether expert testimony is required and the scope of any damages issues.

5. Anticipated areas of any expert testimony, timing for identification of experts, responses to expert discovery, and exchange of expert reports

The parties anticipate expert testimony, if any, may address: (a) damages, including lost business opportunities; (b) reputational harm and causation; and (c) digital publication issues (including online analytics) to the extent relevant to damages and causation.

Experts will be disclosed after substantial completion of fact discovery. The parties will identify any testifying experts and produce expert reports within **45 days after the close of fact discovery**. Disclosure of any rebuttal experts and reports within **30 days thereafter**. Expert discovery (including expert depositions and any expert-related written discovery) will be completed **within 60 days** after rebuttal disclosures.

6. An estimate of the volume of documents and computerized information likely to be the subject of discovery from parties and nonparties and whether there are technological means which may render document discovery more manageable at an acceptable cost

Discovery is expected to be driven largely by electronically stored information (“ESI”). The parties anticipate a moderate volume of documents from the parties, with additional targeted productions from nonparties (including platform providers and third parties with relevant business communications). From De Hek, the likely sources include email accounts, computers/phones, messaging applications, and social media/video platforms used to draft, publish, edit, and

promote the alleged defamatory content, which may include drafts, communications, source materials, posting histories, and analytics.

To keep document discovery manageable and proportionate, the parties anticipate using common technological and process measures, including agreed custodians and date ranges, targeted search terms, deduplication, production in reasonably usable electronic format with metadata where appropriate, and use of commercially available review platforms to reduce cost and streamline review.

7. The advisability of using the general magistrate or special magistrate for fact finding, mediation, or discovery disputes or such other matters as the parties may agree upon

The parties that the Court may, in its discretion, refer appropriate matters to a general magistrate or special magistrate, including for discovery disputes, fact-finding on discrete issues, or other pretrial matters, if doing so would promote efficiency and reduce the need for repeated hearings.

8. The time period after the close of discovery within which post-discovery dispositive motions shall be filed, briefed, and argued, and a tentative schedule for such activities

The parties propose that any post-discovery dispositive motions (including motions for summary judgment) be **filed within 30 days** after the close of discovery. Responses shall be **due within 30 days** after service of the motion, and replies (if permitted) shall be **due within 10 days** thereafter. The parties propose that such motions be set for hearing on the Court's next available hearing calendar

following the completion of briefing, with the understanding that hearing dates are subject to the Court's availability.

9. The possibility of settlement and the timing of alternative dispute resolution, including the selection of a mediator or arbitrator(s)

The parties recognize the possibility of settlement and agree that some form of alternative dispute resolution may be productive once the record is sufficiently developed. The parties propose to participate in mediation after substantial completion of core fact discovery and before the close of discovery, with mediation to occur approximately **60–90 days before the discovery cutoff**, unless the parties agree earlier or the Court orders otherwise. The parties will confer in good faith regarding the selection of a mutually acceptable mediator (or other neutral), the format of mediation (in person or remote), and the allocation of mediation costs.

10. whether or not a party or parties desire to use technologically advanced methods of presentation or court-reporting and, to the extent that this is the case, a determination of the following

- a. fairness issues, including but not necessarily limited to use of such capabilities by some but not all of the parties and/or by parties whose resources permit or require variations in the use of such capabilities**

At this time, the parties anticipate using standard litigation technology, including electronic service and production of documents/ESI and remote deposition capabilities where appropriate. To the extent technologically advanced methods are used for presentation at hearings or trial (e.g., electronic exhibit

presentation), the parties agree such use should be implemented in a manner that is fair and does not prejudice any party based on differences in resources or access to technology.

b. issues related to compatibility of court and party facilities and equipment

The parties do not anticipate material compatibility issues at this stage.

c. issues related to the use of demonstrative exhibits and any balancing of relevance and potential prejudice which may need to occur in connection with such exhibits; and

The parties do not anticipate issues at this stage

d. such other issues related to the use of the Court's and parties' special technological facilities as may be raised by any party or the Court or its technological advisor, given the nature of the case and the resources of the parties.

The parties do not anticipate issues at this stage

11. A good faith estimate by counsel for each party based upon consultation with all of the parties of the attorney's fees and costs each party is likely to incur in pursuing the litigation through trial court adjudication

- Plaintiff estimates, in good faith that its attorney's fees and costs through trial court adjudication will be approximately **\$300,000 or more**.
- Defendant does not have counsel and will likely incur **\$0** in attorneys' fees.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document is being served, pursuant to Rule 2.516(b), Fla. R. Jud. Admin., *via* Florida Courts e-

Filing Portal to the names and e-mail addresses provided by all parties, counsel of record and *pro se* parties.

Dated: February 25, 2026

Respectfully submitted:

/s/ Oliver M. Birman

Paul D. Turner, Esq. (0113743)

pturner@pbyalaw.com

Ricardo A. Arce Esq. (076201)

rarce@pbyalaw.com

Oliver M. Birman, Esq. (123750)

obirman@pbyalaw.com

David Robbins, Esq. (1012340)

[drobbins@pbyalaw.com](mailto:d Robbins@pbyalaw.com)

PERLMAN, BAJANDAS, YEVOLI &
ALBRIGHT, P.L.

200 South Andrews Avenue, Suite 600

Fort Lauderdale, Florida 33301

T: (954) 566-7117 / F: (954) 566-7115

Attorneys for Plaintiff