

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**WIGBERTO LUGO-MENDER as the duly  
appointed Trustee in the liquidation of  
EURO PACIFIC INTERNATIONAL  
BANK, INC.**

*Plaintiff,*

vs.

**QENTA, INC.; PETER D. SCHIFF;  
BRENT DE JONG; ABC INSURANCE  
COMPANY; XYZ INSURANCE  
COMPANY; and DEFENDANTS A and B.**

*Defendants,*

**EURO PACIFIC FUNDS SCC LTD.;  
EURO PACIFIC SECURITIES, INC.;  
EURO PACIFIC CARD SERVICES LTD.  
AND GLOBAL CORPORATE STAFFING  
LTD.**

*Parties in Interest.*

CASE NO.: **25-cv-1501(PAD/GLS)**

VIOLATION OF THE COMMODITY  
EXCHANGE ACT, 7 U.S.C. § 1, *et. seq.*;  
VIOLATION OF THE RACKETEER  
INFLUENCED AND CORRUPT  
ORGANIZATIONS ACT, 18 U.S.C. §1962;  
DECLARATORY JUDGMENT;  
REQUEST FOR PROVISIONAL  
REMEDIES PURSUANT TO THE  
PUERTO RICO RULES OF CIVIL  
PROCEDURE; DEMAND FOR TRIAL BY  
JURY

**MOTION TO HOLD MOTIONS TO DISMISS IN ABEYANCE PENDING  
SETTLEMENT DISCUSSIONS**

**TO THE HONORABLE COURT:**

COMES NOW, Wigberto Lugo-Mender, in his capacity as the duly appointed Trustee in the liquidation of **Euro Pacific International Bank, Inc.** (hereinafter “EPIB”), by and through its undersigned counsel, very respectfully STATES and PRAYS:

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Defendants Qenta Inc., Mr. Brent De Jong and Mr. Peter D. Schiff, have filed motions to dismiss the above-captioned complaint (See, Docket Nos 36 and 37).

Notwithstanding, and by order of the Court, the parties have conferred on multiple occasions for the purpose of exploring a negotiated resolution of this matter. The Trustee and Qenta, in particular, have engaged in meaningful and substantive discussions and remain hopeful that a settlement can be achieved, which may materially benefit EIPB's customers and promote judicial economy.

In light of these ongoing discussions, Plaintiff respectfully requests that the Court hold in abeyance the adjudication of the currently pending motions to dismiss until such time as settlement negotiations have concluded.

Should the parties be unable to resolve the dispute, the Trustee is prepared to respond to the motions to dismiss within whatever term is set by the Court from the conclusion of the settlement discussions.

Granting this request will serve judicial economy, avoid unnecessary expenditure of party and judicial resources, and foster the possibility of an early global resolution in the best interest of affected EPIB customers and all parties.

**WHEREFORE**, Plaintiff respectfully requests that the Court: (i) hold the pending motions to dismiss in abeyance pending the conclusion of settlement negotiations; (ii) set an appropriate deadline, if necessary, for any future filings should settlement not be reached; and, (iii) grant such other and further relief as the Court deems just and proper.

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**WE HEREBY CERTIFY:** that on this date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 29th day of October 2025

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