

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

WIGBERTO LUGO-MENDER, as Trustee for
Euro Pacific International Bank, Inc.,

Plaintiff,

v.

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.

Civil No.: 25-cv-1501 (PAD) (GLS)

INFORMATIVE MOTION

The Court's Minute orders dated October 8, 2025 [ECF 35] ("Order") ordered the parties to meet to discuss, among other things, "the possibility of reaching out of court agreements that could streamline the issues and remedies sought by Plaintiff," and to file an informative motion by October 29, 2025 "on the status of their discussions and proposals for the resolution of Plaintiff's request for provisional remedies."

Pursuant to the Order, Plaintiff Wigberto-Mender as Trustee for Euro Pacific International Bank Inc. (the "Trustee") and Defendants Qenta, Inc. ("Qenta") and Brent de Jong (together with Qenta, the "Qenta Parties") submitted an informative motion on October 29, 2025 [ECF 44] reporting that the parties had met and were actively discussing a potential resolution that would

address the Trustee's concerns regarding opt-in customers that have animated his Complaint and the request for provisional remedies. The Trustee and the Qenta Parties respectfully requested permission to submit an informative motion on November 12, 2025, advising as to the status of their discussions, and the Court by text-only docket order [ECF 47] granted this request, stating: "Joint Informative Motion on status of settlement discussions due by 11/12/2025" and setting a conference for November 14, 2025.

Pursuant to that order, the Trustee and the Qenta Parties report that they have continued to meet and confer since the prior Informative Motion was submitted. Qenta and the Trustee have been exchanging documentation which will be conducive to a settlement agreement that, in the Qenta Parties' view, would address the Trustee's concerns and pave the way for appropriate and orderly satisfaction of the claims of all customers. The Trustee is still waiting to receive from Qenta certain information necessary for him to evaluate a comprehensive settlement for its request for provisional remedies. Qenta intends to provide additional information in the next 24 hours.

The Qenta Parties request that the Court grant additional time to continue these conversations, and are hopeful that an agreement can be reached in short order.

WHEREFORE, the Trustee and the Qenta Parties respectfully request that this Honorable Court to take note of the aforementioned, with whatever other relief it deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of November 2025

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