

**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 November 14, 2025 [ECF 52] (“Order”) ordered Qenta, Inc. (“Qenta”), to produce an accounting of certain assets. The Court also ordered the parties to file an informative motion on the status of this production by November 21, 2025.

Pursuant to the Order, Plaintiff Wigberto Lugo-Mender as Trustee for Euro Pacific International Bank Inc. (the “Trustee”) and Defendants Qenta, Inc. (“Qenta”), Brent de Jong (together with Qenta, the “Qenta Parties”), and Peter Schiff (all of the foregoing collectively, “the Parties”) state as follows:

Qenta has provided the parties information regarding the EPIB assets transferred to it and its capacity to satisfy the claims of the opt-in customers. Settlement discussions are ongoing.

WHEREFORE, the Parties respectfully request that this Honorable Court permit them to continue negotiations and file the informative motion on the status of said negotiations on the court ordered date, December 1, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of November 2025

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