

**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 No. 52] (“Order”) directed Qenta, Inc. (“Qenta”) to produce an accounting of certain assets. The Court further required the parties to file an informative motion regarding the status of this production by November 21, 2025, which the parties duly complied with.

Additionally, in the same Order, the Court instructed the parties to report the results of the settlement negotiations on December 1, 2025.

Pursuant to the Order, Plaintiff Wigberto Lugo-Mender as Trustee for Euro Pacific International Bank Inc. (the “Trustee”) and Defendants Qenta, Brent de Jong (together with Qenta,

the “Qenta Parties”), and Peter Schiff (all of the foregoing collectively, “the Parties”) state as follows:

On November 21, 2025, Qenta provided the Parties with information regarding the EPIB assets transferred to it and its capacity to satisfy the claims of the opt-in customers, and concomitantly made another proposal for a global resolution. Qenta awaits the Trustee’s response. The Trustee reports that it has been reviewing the information provided, including a reconciliation with its own accounting data, while simultaneously preparing a counteroffer for the Parties’ evaluation.

Given the Parties’ ongoing efforts and willingness to work through various complexities to resolve this matter, the Trustee and the Qenta Parties respectfully request that this Honorable Court grant a 30-day extension of all current deadlines to allow the Parties an opportunity to focus on definitively resolving this complex case.<sup>1</sup> The Parties believe their efforts are best focused at this time on reaching an agreement rather than on preparations for a complex hearing, and anticipate that if the extension is granted, the Parties will conclude their negotiations by the end of this month. The requested extension is especially meaningful in light of the inherent delays of the upcoming holiday season.

**WHEREFORE**, the Parties respectfully request that this Honorable Court permit them to continue negotiations and to file a motion reporting on the status of said negotiations on December 8, 2025.

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<sup>1</sup> Schiff does not consent to the length of the requested extension.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 1<sup>st</sup> day of December 2025.

EDGE Legal, LLC  
252 Ponce de León Ave.  
Citibank Tower, Suite 1200  
San Juan, Puerto Rico 00918  
Tel. (787) 522-2000  
Fax (787) 522-2010

/s/Eyck O. Lugo  
EYCK O. LUGO, ESQ.  
USDN 216708  
E-mail: [elugo@edgelegal.com](mailto:elugo@edgelegal.com)

*Counsel for Plaintiff*

PIRILLO LAW, LLC.

/s/ Jose E. Nassar-Veglio  
Jose E. Nassar-Veglio  
PO Box 194981  
San Juan, PR 00919-4981  
Tel.: (787) 957-3077  
USDC-PR 220308  
[jnassar@pirillolaw.com](mailto:jnassar@pirillolaw.com)

KATSKY KORINS LLP  
Daniel R. Walfish (*pro hac vice*)  
Elan R. Dobbs (*pro hac vice*)  
605 Third Avenue  
New York, New York 10158  
Tel.: 212-953-6000  
[dwalfish@katskykorins.com](mailto:dwalfish@katskykorins.com)  
[edobbs@katskykorins.com](mailto:edobbs@katskykorins.com)

*Attorneys for Defendants Qenta Inc. and  
Brent de Jong*

DMR Law LLC  
Capital Center Bldg.  
Suite 1101  
San Juan, PR 00918  
Tel. 787-331-9970

/s/Javier F. Micheo Marcial  
Javier F. Micheo Marcial  
USDC-PR No. 305310  
[j.micheo@dmrpr.com](mailto:j.micheo@dmrpr.com)

*Attorneys for Defendant Peter Schiff*