

**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**

On December 2, 2025, following the Informative Motion filed on December 1, 2025, reporting the status of the settlement negotiations, the Court entered an Order [ECF 58] providing in part: “Plaintiff is to respond to Defendants’ offer by December 8, 2025. Joint informative motion on status of negotiations due on December 8, 2025.”

Pursuant to the Court’s 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:

On December 5, 2025, the Parties met to discuss a potential global resolution, considering several scenarios for a possible settlement of all claims. The Parties reconvened on December 8, 2025, to continue evaluating settlement proposals. During this meeting, the Trustee informed Defendants that they should expect to receive a written counterproposal by Wednesday, December 10, 2025.

The Parties continue to negotiate in good faith to address the complexities of this matter and to work toward resolution. Accordingly, the Parties respectfully request that this Honorable Court grant them until Friday December 19, 2025, to allow the Parties to provide an updated report on the settlement proposal.

**WHEREFORE**, the Parties respectfully request that this Honorable Court permit them to continue settlement negotiations and grant leave to file a joint status report regarding the Settlement Agreement on or before December 19, 2025.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 8<sup>th</sup> day of December 2025.

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