

**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 9, 2025, following the Informative Motion filed on December 8, 2025, continuing to report on the status of the settlement negotiations, the Court entered an Order [ECF 62] instructing the Parties by December 19, 2025, to submit a “Joint Status Report on settlement.”

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 (collectively, “the Parties”) respectfully inform the Court as follows:

On Thursday, December 11, 2025, the Trustee circulated a counterproposal term sheet for evaluation by the defendants. The counterproposal was intended to address the various

complexities associated with one of the settlement options previously discussed that could potentially resolve this matter.

On Friday, December 19, 2025, the Parties conferred to discuss the terms and conditions of the counterproposal, including potential modifications necessary to accommodate the respective positions and concerns of each party. As a result of those discussions, the Parties agreed that the defendants would provide Trustee's counsel with their input regarding the terms and conditions of a potential settlement agreement by **December 24, 2025**, with the goal of circulating a draft settlement agreement by **January 9, 2026**.

As previously reported to the Court, the Parties have continued to engage in good faith settlement negotiations and have made meaningful progress toward identifying a suitable and responsible resolution of this matter. The Parties believe that the additional time requested will allow them to further refine the terms under discussion and potentially finalize a settlement agreement. Accordingly, considering the upcoming holiday season and the progress made to date, the Parties respectfully request that the Court grant them until **Friday, January 9, 2026**, to provide the Court with a further joint status report on the progress of settlement negotiations.

**WHEREFORE**, the Parties respectfully request that this Honorable Court permit them to continue settlement negotiations and grant leave to file a joint report regarding the status of same on or before **January 9, 2026**.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 19<sup>th</sup> day of December 2025.

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