

**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)

**JOINT INFORMATIVE MOTION
ON ELECTION OF PRIVATE MEDIATOR**

TO THE HONORABLE COURT:

COMES NOW, 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”) by and through their respective counsel, and hereby submit this motion pursuant to this Court's Order of January 14, 2026 (Docket No. 70) directing the parties to inform the Court on their election of a private mediator by today’s date.

1. Pursuant to the Court’s Order dated January 14, 2026 (Docket No. 70), directing the parties to agree upon a private mediator and inform the Court within seven (7) days, the parties

hereby notify the Court that they have jointly selected Francisco Bruno-Rovira, Esq.¹ to serve as the mediator in this matter.

2. Mr. Bruno-Rovira has confirmed to counsel that he is available to conduct the mediation prior to the Court's February 27, 2026 deadline. However, because the parties reached agreement on the selection of a mediator only recently, they are still in the process of coordinating schedules with Mr. Bruno in order to set a specific mediation date.

3. Accordingly, the parties respectfully request the Court grant them a brief extension of time until Monday, January 26, 2026, to inform of the confirmed mediation date.

WHEREFORE, the Parties respectfully request that this Honorable Court take notice of the aforementioned and: (i) grant the parties until Monday, January 26, 2026 to inform the Court of the date(s) on which the mediation is set to take place; and (ii) grant such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of January 2026.

[Signatures on the following page]

¹ <https://www.prd.uscourts.gov/content/francisco-g-bruno-rovira>

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