

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**WIGBERTO LUGO-MENDER as the duly
appointed Trustee in the liquidation of
EURO PACIFIC INTERNATIONAL
BANK, INC.**

Plaintiff,

vs.

**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.

CASE NO.: **25-cv-1501 (PAD-GLS)**

VIOLATION OF THE COMMODITY
EXCHANGE ACT, 7 U.S.C. § 1, *et. seq.*;
VIOLATION OF THE RACKETEER
INFLUENCED AND CORRUPT
ORGANIZATIONS ACT, 18 U.S.C. §1962;
DECLARATORY JUDGMENT;
REQUEST FOR PROVISIONAL
REMEDIES PURSUANT TO THE
PUERTO RICO RULES OF CIVIL
PROCEDURE; DEMAND FOR TRIAL BY
JURY

**MOTION INFORMING STATUS OF NOTICE AND SERVICE TO PARTIES
AND FOR ADDITIONAL TIME**

TO THE HONORABLE COURT:

COMES NOW Plaintiff **Wigberto Lugo-Mender** as Trustee of Euro Pacific International Bank, Inc. (“Plaintiff” or “Trustee”), by and through undersigned counsel, respectfully submits this motion to inform the Court of the status of notice and service upon

the parties and to request a brief extension of time to complete service on certain Defendants, and in support states as follows:

Pursuant to the Court's order of September 17, 2025 (Docket No. 4), which requires Plaintiff to effectuate service of the summons, Verified Complaint, and Emergency Motion upon the parties by yesterday, September 23rd, Plaintiff has taken diligent steps to meet this obligation, as instructed.

On September 17, 2025, and prior to issuance of summons, Plaintiff served full copies of the Verified Complaint and Emergency Motion via email to Attorneys Javier Micheo and Ismael Torres, Puerto Rico counsel for Mr. Peter Schiff, and to Attorney Martin Pirillo, Puerto Rico counsel for Qenta, Inc. See, **Exhibit 1**. All Puerto Rico counsel for Defendants acknowledged receipt of these filings.

Notice was also provided contemporaneously to attorney Carlos Garduño, US in house counsel for Qenta, Inc., as well as to Qenta, Inc.'s general legal notices email address at legalnotices@qenta.com. *Id.*

On September 18, 2025, the Court issued summons for the named Defendants, (Docket No. 6). Following issuance of the summons and in compliance with the Court's order, Plaintiff promptly engaged process servers locally and in Houston, Texas, to execute formal personal service on the named Defendants.

On September 19, 2025, attorney Javier Micheo waived personal service on behalf of Mr. Peter Schiff in exchange for a stipulated 15-day extension of time to respond to the Verified Complaint, demonstrating Plaintiff's cooperative and diligent efforts. See, **Exhibit 2**.

Process servers in Houston attempted service at the last known address for Qenta, Inc. and its principal, Mr. Brent De Jong. However, it has been confirmed that Qenta is no longer operating at its last reported location.

Plaintiff's counsel, together with its Houston-based process servers, are actively pursuing alternate addresses and other means to complete service on Qenta, Inc. and Mr. De Jong. In light of these ongoing efforts, Plaintiff respectfully requests a brief extension of two (2) business days to effectuate service on the outstanding Defendants.

Plaintiff reaffirms its commitment to comply fully with the Court's order and all applicable procedural requirements within the timeframes directed, underscoring the urgency and importance of the matter.

WHEREFORE, we respectfully request that the Court take notice of the status of notice and service as set forth herein and, consequently grant an extension of two (2) business days to complete service upon Qenta, Inc. and Mr. Brent De Jong.

WE HEREBY CERTIFY: On this date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 23rd day of September 2025.

EDGE Legal, LLC
252 Ponce de León Ave.
Citibank Tower, 12th Floor
San Juan, Puerto Rico 00918
Tel. (787) 522-2000
Fax (787) 522-2010

s/Eyck O. Lugo

EYCK O. LUGO, ESQ.

USDC 216708

E-mail: elugo@edgelegal.com

Eyck O. Lugo Rivera

From: Eyck O. Lugo Rivera
Sent: Wednesday, September 17, 2025 10:25 AM
To: j.micheo@dmrpr.com; ismaeltorres2002; Martín Pirillo; Carlos Garduno; legalnotices@qenta.com
Cc: Adriana Vega Hernández; Anna Caban
Subject: RE: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD)

Importance: High

Tracking:	Recipient	Delivery	Read
	j.micheo@dmrpr.com		
	ismaeltorres2002		
	Martín Pirillo		
	Carlos Garduno		
	legalnotices@qenta.com		
	Adriana Vega Hernández	Delivered: 9/17/2025 10:26 AM	Read: 9/17/2025 10:28 AM
	Anna Caban	Delivered: 9/17/2025 10:26 AM	

Dear Counsel,

Please be advised that the Verified Complaint and Emergency Motion requesting provisional remedies have been filed with the U.S. District Court for the District of Puerto Rico against Qenta, Inc., Mr. Peter D. Schiff and Mr. Brent De Jong in the matter involving the ongoing liquidation of Euro Pacific International Bank, Inc.

For your reference and convenience, copies of the filed Verified Complaint and Emergency Motion, together with all exhibits, are available via the following link:

 [NOTIFY](#) (Expiration date to download: Before Wednesday, September. 24, 2025)

This communication serves to notify known counsel for these parties of the action prior to service of process, should the Court inquire as to notice being provided in advance.

Please feel free to reach out should you require any further information.

Cordially,



Eyck O. Lugo-Rivera, Esq.

252 Ponce de León Avenue, Citi Tower, 12th Floor, San Juan, PR 00918

E elugo@edgelegal.com **T** 787.522.2016 **F** 787.522.2010 **W** www.edgelegal.com

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Eyck O. Lugo Rivera

From: avier Micheo j.micheo@dmrpr.com
Sent: Friday, September 19, 2025 6: 0 PM
To: Eyck O. Lugo Rivera
Subject: Re: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

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Yes sir. Confirmed that I am accepting summons via email on behalf of Mr. Schiff in lieu of personal service.

Have a good weekend,
Javier

From: Eyck O. Lugo Rivera <elugo@edgelegal.com>
Date: Friday, September 19, 2025 at 5:59 PM
To: Javier Micheo <j.micheo@dmrpr.com>
Subject: RE: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

Dear counsel,

Enclosed please find the summons for Mr. Schiff, together with the order entered by the Court regarding service of process and briefing schedule. Please confirm receipt and that you are accepting service on behalf of Mr. Schiff without further action on our part.

Also, Plaintiff does not have an objection to the 15-day extension requested by Mr. Schiff to respond to the Verified Complaint.

Cordially,



Eyck O. Lugo-Rivera, Esq.

252 Ponce de León Avenue, Citi Tower, 12th Floor, San Juan, PR 00918
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From: Javier Micheo <j.micheo@dmrpr.com>
Sent: Friday, September 19, 2025 5:41 PM
To: Eyck O. Lugo Rivera <elugo@edgelegal.com>
Subject: Re: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

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Just send them via email. No need to go through all that.

From: Eyck O. Lugo Rivera <elugo@edgelegal.com>
Date: Friday, September 19, 2025 at 5:40 PM
To: Javier Micheo <j.micheo@dmrpr.com>
Subject: RE: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

Thank you.

I will have my process server, Mr. Serrano, reach out to you Monday morning to coordinate delivery of Mr. Schiff's summons.

Cordially,



Eyck O. Lugo-Rivera, Esq.

252 Ponce de León Avenue, Citi Tower, 12th Floor, San Juan, PR 00918
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From: Javier Micheo <j.micheo@dmrpr.com>
Sent: Friday, September 19, 2025 3:00 PM

To: Eyck O. Lugo Rivera <elugo@edgelegal.com>

Subject: Re: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

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Eyck,

Thank you for reaching out. I appreciate your courtesy in doing so.

I am authorized to accept service on behalf of Mr. Schiff. I am not authorized to accept on behalf of those entities because Mr. Schiff does not own them. They either 1) belong to EPB (which means Wigberto would be the person to serve) or 2) belong to Qenta, Inc. (if the APA actually closed, which we dispute). Either way, Mr. Schiff can't accept service on their behalf.

We await your response on the 15 days.

Best,
Javier

From: Eyck O. Lugo Rivera <elugo@edgelegal.com>

Date: Friday, September 19, 2025 at 2:50 PM

To: Javier Micheo <j.micheo@dmrpr.com>

Subject: Lugo-Mender v. Qenta, Inc. et. al., Case No. 25-cv-01501 (PAD-GLS)

Dear counsel,

As discussed during today's call, please advise if you would be willing to accept service of process in the referenced action on behalf of your client, M. Peter Schiff (on behalf of himself, and the named parties in interest Euro Pacific Funds SCC Ltd., Euro Pacific Securities, Inc., Euro Pacific Card Services Ltd. and Global Corporate Staffing Ltd.) The parties in interest are not defendants and were joined to the action as possible creditors of the assets the Receiver seeks to recover.

I will also consult with our client your request for a stipulated extension of time of 15 days for Mr. Schiff to respond to the complaint.

Thank you,



Eyck O. Lugo-Rivera, Esq.

252 Ponce de León Avenue, Citi Tower, 12th Floor, San Juan, PR 00918

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