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 22, 2025, following the Informative Motion filed on December 19, 2025, continuing to report on the status of the settlement negotiations, the Court entered an Order [ECF 64] instructing the Parties by January 7, 2026 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 December 24, the Qenta Parties and Schiff provided comments on the Trustee's term sheet circulated earlier in the month. On December 30, Schiff provided comments on the Qenta Parties' comments.

On this date, the Trustee requested certain information from Qenta. Also on this date, the Trustee circulated a revised draft settlement agreement and proposed next steps for concluding this matter.

The other parties are reviewing and considering the Trustee's proposals and all Parties propose to submit an informative motion on January 12, 2026 as to next steps for concluding the matter. The Trustee requests to extend the deadline for opposing the pending motions (currently January 8) to January 16, subject to the forthcoming January 12 informative motion. The Parties are hopeful that by January 12, they will have a clearer understanding of how long they will need to finalize their settlement discussions.

WHEREFORE, the Parties respectfully request that this Honorable Court permit them to continue settlement discussions and grant leave to file a joint report regarding the status of same on or before **January 12, 2026**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of January 2026.

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