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 January 27, 2026, following the Informative Motion filed on January 26, 2026, reporting to the court the dates selected to conduct the private mediation sessions, the Court entered an Order [ECF 73] instructing the Parties by February 27, to submit a "Joint Status Report on settlement discussions."

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 January 26, 2026, in compliance with the Court's January 22, 2026, Order, the Parties filed a Joint Informative Motion notifying the Court that they had agreed to participate in private mediation before Attorney Francisco Bruno on February 23 and/or 24, 2026.

Due to weather-related circumstances, the mediation was rescheduled and conducted on February 24, 2026 (virtually, half-day), and February 25, 2026 (in person, full day). During those sessions, the Parties addressed and discussed the pending issues in dispute.

Despite the parties' efforts to conclude a settlement by the February 27, 2026 reporting date, more time is needed to further discuss before determining whether a definitive settlement agreement can be reached.

Accordingly, the Parties respectfully request an additional fourteen (14) days to conduct a final mediation session(s) and complete their settlement efforts. The Parties further request leave to file a final Joint Informative Motion no later than **March 13, 2026**, advising the Court of the outcome of such mediation.

As previously represented to the Court, the Parties remain committed to continuing their good-faith participation in mediation and will promptly notify the Court upon conclusion of the final session.

WHEREFORE, the Parties respectfully request that this Honorable Court grant them fourteen (14) additional days to complete mediation efforts and permit the filing of a final Joint Informative Motion on or before **March 13, 2026.**

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of February 2026.

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