**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF PUERTO RICO**

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| WIGBERTO LUGO-MENDER, as Trustee for Euro Pacific International Bank, Inc.,<br><br>*Plaintiff*,<br><br>v.<br><br>QENTA, INC.; PETER D. SCHIFF; BRENT DE JONG; ABC INSURANCE COMPANY; XYZ INSURANCE COMPANY; and DEFENDANTS A and B,<br><br>*Defendants*,<br><br>EURO PACIFIC FUNDS SCC LTD.; EURO PACIFIC SECURITIES, INC.; EURO PACIFIC CARD SERVICES LTD. and GLOBAL CORPORATE STAFFING LTD.<br><br>*Parties In Interest*. | **Civil No.: 25-cv-1501 (PAD) (GLS)** |

**MOTION FOR ONE-BUSINESS-DAY EXTENSION OF TIME TO FILE JOINT STATUS REPORT**

**TO THE HONORABLE COURT:**

**COMES NOW,** Plaintiff **Wigberto Lugo-Mender** as Trustee for Euro Pacific International Bank Inc. (the "Trustee"), through the undersigned counsel, and respectfully requests a brief extension of time to file the Joint Informative Motion required by the Court's Order dated March 2, 2026 (Docket No. 76). In support thereof, the Trustee states as follows:

1. On March 2, 2026, the Court entered an Order noting and approving the parties' most recent Informative Motion on the subject of settlement and directing the parties to file a joint report on settlement discussions on or before March 13, 2026.

2. The parties have been actively engaged in mediation efforts aimed at resolving this matter. The Trustee respectfully submits that substantial progress has been made as part of the ongoing mediation process.

3. As part of these discussions, the Trustee is also addressing certain regulatory considerations associated with the administration and potential distribution of certain customer assets, which require careful coordination with the Office of the Commissioner of Financial Institutions.

4. The parties have been working toward submitting a joint informative motion to comply with the Court's Order. However, additional time is needed to finalize the joint filing.

5. Accordingly, and in order to allow the parties to submit a complete and coordinated joint report, the Trustee respectfully requests a one-business-day extension, until Monday, March 16, 2026, to file the required joint informative motion.

6. This request is made in good faith, will not prejudice any party, and will assist the parties in continuing their good-faith efforts toward a possible resolution of this matter.

**WHEREFORE**, the Trustee respectfully requests that the Court grant a brief extension of time until March 16, 2026, within which to file the Joint Informative Motion required by the Court's Order at Docket No. 76, and grant such other relief as the Court deems just and proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 13th day of March 2026.

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