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 March 2, 2026, following the Informative Motion filed on February 27, 2026, reporting to the court on the mediation that took place over February 24-25, 2026, the Court entered an Order [ECF 76] instructing the Parties on March 13, 2026 to submit a "Joint report on settlement." The Trustee moved for a one-business-day extension, which the Court granted [ECF 77].

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:

Since the mediation Qenta has sent a draft settlement agreement to the other parties and awaits their comments. The parties continue to work through certain issues respecting the features of a resolution including, among others, critical input from the Office of the Commissioner of Financial Institutions. In addition, the Trustee's counsel has been traveling this week, which has delayed discussions.

Given the complexity of the issues they are working through, the Qenta Parties and the Trustee believe additional time would be beneficial, and request leave to file a further Joint Informative Motion no later than **March 27, 2026**, advising the Court of the outcome of their settlement efforts.[1]

WHEREFORE, the Trustee and the Qenta Parties respectfully request that this Honorable Court grant them fourteen (14) additional days to complete settlement efforts and permit the filing of a final Joint Informative Motion on or before **March 27, 2026.**

[1] Schiff is not a party to the request for additional time but is committed to participating in settlement discussions in good faith.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of March 2026.

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