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)**

MOTION FOR TWO-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 of two business days to file the Joint Informative Motion required by the Court's Order dated March 16, 2026 (Docket No. 80). In support thereof, the Trustee states as follows:

1. On March 16, 2026, the Court entered an Order acknowledging the parties' most recent Informative Motion and directing the parties to file a final joint informative motion on or before March 27, 2026 (Docket No. 80).

2. Since the commencement of the settlement process, and continuing through the period following the Court's most recent Order, the parties have been actively engaged in ongoing, detailed, and productive settlement discussions.

3. As the Court is aware, this case involves complex factual, legal, and regulatory issues, as well as matters of significant public interest. As a result, the settlement discussions have likewise been complex and have required careful consideration of these issues.

4. While substantial progress continues to be made, the parties require a brief additional period of time to confer and finalize the remaining issues under the current settlement structure being considered.

5. The Trustee's intent is to be in a position, on or before March 31, 2026, to inform the Court not only of the status of the negotiations, but also of a final date by which a Settlement Agreement will be executed, together with any corresponding request for relief to the Court.

6. The Trustee is mindful of the time that has been devoted to these settlement efforts and is appreciative of the Court's continued latitude in allowing the parties to pursue a resolution. The time afforded by the Court has not been wasted and has materially advanced the parties toward a potential settlement.

7. Accordingly, the Trustee respectfully requests a two (2) business-day extension of time, through March 31, 2026, within which to file the required final Joint Informative Motion.

8. This request is made in good faith, will not prejudice any party, and will assist the parties in their continued efforts to reach a resolution of this matter.

WHEREFORE, the Trustee respectfully requests that the Court grant a brief extension of time until March 31, 2026, within which to file the Joint Informative Motion required by the Court's Order at Docket No. 80.

RESPECTFULLY SUBMITTED.

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

THE LUGO LAW FIRM
173 O'NEILL STREET
SAN JUAN, PUERTO RICO 00918
TEL. (787) 705-9043

/S/EYCK O. LUGO
EYCK O. LUGO, ESQ.
USDN 216708

E-MAIL: ELUGO@LUGOLAWFIRMPR.COM

COUNSEL FOR PLAINTIFF