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)**

JOINT INFORMATIVE MOTION
ON STATUS OF SETTLEMENT NEGOTIATIONS

TO THE HONORABLE COURT:

COMES NOW, 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 (all of the foregoing collectively, "the Parties") by and through their respective counsel, and hereby submit this Joint Status Report, advising the Court of the status of settlement discussions.

The parties submit this Joint Informative Motion in compliance with the Court's Order directing the filing of a final status report regarding settlement discussions.

The Trustee and Qenta are pleased to inform the Court that, following extensive negotiations, the Trustee and Qenta have reached an agreement, in principle, with respect to a proposed Settlement Agreement.

The Trustee and Qenta are currently working collaboratively to finalize certain operational aspects of the agreement, including matters related to execution, administration, and compliance with applicable regulatory requirements.

In addition, the parties are awaiting input from co-defendant Peter D. Schiff with respect to the current draft of the Settlement Agreement and will remain engaged in discussions with him to address any remaining issues. Co-defendant Schiff does not believe that a framework that could possibly be agreeable to him will ever be developed from the current draft agreement.

Notwithstanding the foregoing, the Trustee and Qenta are optimistic about the progress achieved to date and are confident that the remaining matters can be resolved promptly.

At present, the Trustee and Qenta anticipate that the Settlement Agreement can be finalized, executed, and the corresponding settlement documents submitted to the Court within the next fifteen (15) days. Co-defendant Schiff objects to the request for additional time, as he understands additional time will not serve the interests of the customers, the bank, the Office of the Commissioner for Financial Institutions, or himself.

The parties remain committed to working diligently and in good faith to bring this matter to a full resolution.

WHEREFORE, the Parties respectfully request that this Honorable Court that notice of the aforementioned and consequently take notice of the aforementioned and grant such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of March 2026.

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