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)

THE TRUSTEE AND QENTA PARTIES' JOINT INFORMATIVE MOTION REGARDING CONCLUSION OF SETTLEMENT NEGOTIATIONS

TO THE HONORABLE COURT:

COME NOW Plaintiff **Wigberto Lugo-Mender**, as Trustee for Euro Pacific International Bank, Inc. (the "Trustee"), and Defendant **Qenta, Inc.** and **Brent De Jong** ("Qenta Parties"), by and through their undersigned counsel, and respectfully inform the Court as follows:

The appearing parties submit this Informative Motion in compliance with the Court's prior Orders regarding the status of settlement discussions in this matter.

After extensive, continuous, and good-faith negotiations, the Trustee and the Qenta Parties are pleased to inform the Court that they have reached agreement on all key settlement terms necessary to resolve this dispute. The parties are currently in the process of finalizing certain remaining provisions and operational aspects of the Settlement Agreement, which are necessary to ensure its proper implementation and consistency with the applicable regulatory framework.

Based on the progress achieved to date, both the Trustee and the Qenta Parties reasonably believe that the Settlement Agreement can be finalized and executed, together with the filing of the corresponding dismissal documents, within the next five (5) business days.

With respect to co-defendant Peter D. Schiff, the Trustee and Qenta represent that they have, in good faith, considered his input and concerns, and have made substantial efforts to incorporate and address such input within the structure of the proposed settlement.

The Trustee and Qenta will notify Mr. Schiff with the version of the document agreed to by the Trustee and Qenta Parties with the hope that Mr. Schiff will ultimately join in the Settlement Agreement.

The Trustee and the Qenta Parties wish to express their appreciation to the Court for the latitude and time afforded to the parties to pursue a resolution of this matter. The parties respectfully submit that such time has been well utilized, and that they have worked diligently and in good faith toward bringing this litigation to a conclusion.

The appearing parties remain fully committed to finalizing the Settlement Agreement and bringing this matter to a prompt and complete resolution.

WHEREFORE, the Trustee and Qenta Parties respectfully request that this Honorable Court grant them five (5) additional business days within which to finalize and execute the Settlement Agreement and file the corresponding dismissal motions.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of April 2026.

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