**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 BRIEF EXTENSION OF TIME TO FINALIZE SETTLEMENT**

**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 states as follows:

The Court previously granted the parties until April 23, 2026, to execute a settlement agreement and file the corresponding dismissal documents.

The Trustee and Qenta have agreed on the material terms of the proposed Settlement Agreement and are prepared to move forward with execution. As advanced in their prior filing, the Trustee and Qenta were to send co-defendant Peter D. Schiff the version of the document agreed

to by the Trustee and Qenta Parties with the hope that Mr. Schiff would join in the Settlement Agreement.

Mr. Schiff was provided with the latest draft agreement today and, as such, has requested a brief period of three (3) business days to review the final draft of the agreement. The remaining parties have consented to such request in good faith.

In light of the foregoing, the Trustee respectfully requests a brief extension of three (3) business days, through April 28, 2026, within which to execute the Settlement Agreement and submit the corresponding dismissal filings.

This request is made respectfully and in good faith and will assist the parties in bringing this matter to a final resolution.

The Trustee is mindful of the time the Court has afforded the parties to pursue settlement and expresses his sincere appreciation for the Court's continued patience and consideration.

**WHEREFORE**, the Trustee respectfully requests that the Court grant a brief extension of time through April 28, 2026, and grant such other relief as the Court deems just and proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 23rd day of April 2026.

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