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 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 Trustee respectfully informs the Court that the Office of the Commissioner of Financial Institutions of Puerto Rico ("OCIF"), which oversees the liquidation process at the center of this case, has requested that execution of the contemplated Settlement Agreement be

held in abeyance until at least Friday, May 1, 2026, in order to allow for additional review of some of the agreement's operational and regulatory components. While OCIF is not a party to this action, it is the regulatory authority charged with supervising the liquidation process that underlies both this litigation and the proposed settlement, and the Trustee must therefore afford appropriate deference to that request.

As the Court is aware, this matter involves significant public and regulatory interests, and the Trustee respectfully submits that allowing the regulator a brief additional period to complete its review will facilitate the orderly and proper implementation of the contemplated resolution. The Trustee does not make this request lightly. The parties have worked extensively toward finalizing this settlement, and the Trustee remains fully committed to bringing this matter to a prompt conclusion. However, under the circumstances, the Trustee has little practical ability to proceed without accommodating OCIF's request.

The Trustee and the undersigned counsel are mindful of, and sincerely appreciate, the time and patience the Court has afforded the parties throughout this process. The Trustee respectfully submits that such time has been well used and has resulted in substantial progress toward resolution.

Accordingly, the Trustee respectfully requests a brief extension of time through May 1, 2026, within which to execute the Settlement Agreement and file the corresponding dismissal documents.

WHEREFORE, the Trustee respectfully requests that the Court grant a brief extension of time through May 1, 2026, and grant such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of April 2026.

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