IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WIGBERTO LUGO-MENDER, as the duty appointed Trustee in the liquidation of EURO PACIFIC INTERNATIONAL BANK, INC., *Plaintiff*, v. **QENTA, INC.; PETER D. SCHIFF; BRENT DE JONG; ET AL.,** *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.**: 25-1501 (PAD)

MOTION FOR LEAVE TO APPEAR AND FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW Defendant Peter D. Schiff ("Schiff" or "Defendant"), through the undersigned counsel, and respectfully states and prays as follows:

1. On September 16, 2025, Plaintiff Wigberto Lugo-Mender ("Lugo-Mender" or "Trustee") filed a Verified Complaint alleging that Mr. Schiff, along with Qenta Inc. ("Qenta") and other defendants, engaged in a scheme to misappropriate approximately $50 million in customer assets from Euro Pacific International Bank during its liquidation. (*See* Docket No. 1.) The claims against Mr. Schiff include violations of the Commodity Exchange Act and RICO, asserting that he knowingly facilitated the transfer of assets under false pretenses. (*See id.*)

2. The undersigned counsel was retained by Mr. Schiff and respectfully requests leave to appear on his behalf.
3. Also on September 16, 2025, the Trustee filed an "Emergency Motion Requesting Hearing for Provisional Remedies, Including Temporary Restraining Order, to Secure Satisfaction of Judgment" requesting immediate court intervention to prevent the dissipation of approximately $50 million in assets allegedly controlled by Qenta Inc. (*See* Docket No. 2.) The Trustee seeks provisional remedies including a temporary restraining order, asset attachment and garnishment, an injunction against asset transfers, and a full accounting of customer assets, arguing that without such relief, the assets may be lost and any future judgment rendered by the Court would be unenforceable. (*See id.*)
4. Mr. Schiff vigorously disputes the Trustee's allegations, which are demonstrably false. He never conspired with Qenta and never defrauded anyone, and the Trustee filed this lawsuit with full knowledge of those facts. Mr. Schiff's actions were consistently focused on protecting customer assets, not misleading or harming them, and the Complaint fails to identify any specific misrepresentation made by him prior to the customers' decision to opt in to Qenta, which is the only relevant point for any alleged fraud.
5. To properly respond to the Verified Complaint and set forth the numerous arguments for dismissal, Mr. Schiff respectfully requests a 14-day extension from the current deadline of October 1, 2025, through October 15, 2025.
6. This request closely mirrors the extension previously granted to Qenta, which the Court approved just hours ago. (*See* Docket No. 12.)

7. More importantly, the Trustee had already agreed in principle to a 14-day extension for Mr. Schiff to respond or otherwise plead to the Complaint, though that agreement was based on the original deadline of September 29, 2025. (*See* Docket Nos. 4 and 7.)

8. This request is made in good faith and without any dilatory intent.

WHEREFORE, Defendant Peter D. Schiff respectfully requests the Court GRANT this motion.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico on this 29th day of September 2025.

WE HEREBY CERTIFY: Today we have electronically filed the foregoing document using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

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