

At the IAS Term Part LSJ of  
the New York State Supreme Court in  
Westchester County at the Courthouse  
at 111 Dr. Martin Luther King, Jr. Blvd.  
White Plains on August 1, 2025

Present: Hon. Linda S. Jamieson, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER

-----X  
PETER SCHIFF,  
Petitioner,

Index No.: 67774/2025

- against -

QENTA INC., RESPONSIBLE GOLD TRADING DMCC,  
and G-Commerce DMCC  
Respondents.

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**ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINING ORDER**

Upon the Verified Petition of Peter Schiff, dated July 29, 2025, the Affirmation of Peter Schiff, dated July 28, 2025, the Memorandum of Law, and the annexed exhibits, and all prior proceedings:

IT IS ORDERED that Respondents Qenta Inc., Responsible Gold Trading DMCC, and G-Commerce DMCC show cause before this Court, at the Supreme Court, County of Westchester – Commercial Division, 111 Dr. Martin Luther King Jr. Blvd., White Plains, New York 10601, on August 6, 2025, at 10:00 a.m., or as soon thereafter as counsel may be heard, why an order should not be entered:

1. Pursuant to CPLR §§ 7502(c), 6301, and 6313, granting a Preliminary Injunction directing Respondents, their officers, agents, employees, and persons acting in concert, to:

- a. Immediately return all Assets of Euro Pacific International Bank (“EPB”) as defined in PAA Section 1.1, including approximately \$50 million in precious metals, \$19 million in cash, mutual funds, Subsidiary Shares (*e.g.*, Euro Pacific Securities, Inc., Euro Pacific Funds SCC Ltd.), and Assumed Contracts to EPB or its Receiver;
- b. Alternatively, refrain from selling, transferring, encumbering, dissipating, or disposing of such Assets pending arbitration under ICC Rules per PAA Section 8.7;
- c. Provide an immediate accounting of all EPB assets, liabilities, and customer communications, pursuant to CPLR § 3101;

d. Return all Records related to the Assets, pursuant to PAA Section 2.2(e);

2. Granting such other relief as the Court deems just and proper.

~~SUFFICIENT CAUSE APPEARING, it based on Respondents' breach of the PAA, by failing to obtain regulatory approvals, retaining assets without legal or equitable title, and risking dissipation through operational failures and affiliate insolvencies, rendering an arbitration award ineffectual; and it is further~~

SUFFICIENT CAUSE APPEARING, it is ORDERED that, pending the hearing or until further order of this Court, Respondents, their officers, agents, employees and persons acting in concert, are temporarily restrained from selling, transferring, encumbering dissipating, or disposing of any EPB Assets, including approximately \$50 million in precious metals, \$19 million in cash, mutual funds, Subsidiary Shares, and Assumed Contracts;

ORDERED that, Respondents are prohibited from destroying, concealing, or altering any documents or records related to said Assets.

**TBD**

~~ORDERED that, in the exercise of the Court's discretion pursuant to CPLR § 6313(c), Petitioner is not required to give an undertaking pending the hearing on this order to show cause; or in the alternative, in the event an undertaking is required, Petitioner shall post an undertaking in an amount to be fixed by the Court, but not to exceed \$10,000, as a condition to the effectiveness of this Temporary Restraining Order, within five (5) days of entry of this Order.~~

ORDERED that service of this Order, the Verified Petition, Affirmation, Memorandum of Law, and all exhibits shall be made upon Respondents or their counsel by overnight mail and email to legalnotices@genta.com and to Dan Walfish of Katsky Korins LLP at dwalfish@katskykorins.com, on or before August 2, 2025, which shall be deemed sufficient service.

Dated: White Plains, New York

August 1, 2025

SO ORDERED

  
HON. LINDA S. JAMIESON, J.S.C.