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

WIGBERTO LUGO-MENDER, as the duly 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)

REPLY IN SUPPORT OF MOTION FOR SANCTIONS

TO THE HONORABLE COURT:

COMES NOW Defendant Peter D. Schiff ("Schiff" or "Defendant"), through the undersigned counsel, and respectfully files this Reply in Support of his Motion for Sanctions (Docket No. 49; Motion).

I. INTRODUCTION

Wigberto Lugo-Mender's ("Trustee") Opposition to Motion for Sanctions ("Opposition", Docket No. 99) confirms the merits of Mr. Schiff's request. On every specific, documented misrepresentation or material omission Mr. Schiff identified, the Trustee offers no answer.

The pattern is most apparent wherever the Trustee's brief reaches a load-bearing proposition. He asserts that "Rule 11 must be applied with particular caution in complex fraud and RICO litigation." Opposition at 3. He does not cite any law in support of this statement. The law is the opposite. Because a RICO charge carries "an almost inevitable stigmatizing effect," counsel's pre-filing duty is *heightened*. *Katzman v. Victoria's Secret Catalogue*, 167 F.R.D. 649, 660–61 (S.D.N.Y. 1996)(Citations omitted)(Empahsis ours). He asserts that "courts should exercise particular caution before imposing sanctions against fiduciaries" — again without authority. He also argues sanctions are warranted "only where there exists no colorable basis whatsoever" for a claim, with no citation in support there either. The Opposition's legal framing rests entirely on propositions the Trustee was unable, or unwilling, to support.

The factual record fares no better. The Trustee's Verified Complaint was sworn and accompanied with a twenty-four-page declaration. Yet on the charge that Mr. Schiff conspired with co-Defendants Qenta, Inc. ("Qenta") and Brent de Jong, the Trustee identifies no document Mr. Schiff authored, no misrepresentation he made during span of the alleged conspiracy, and no predicate act he committed in furtherance of that alleged conspiracy. The Opposition does not defend the allegation that Mr. Schiff controlled the bank's website during the period of the alleged "joint statements." It does not address that the customer silver sits beyond Qenta's reach only because Mr. Schiff acted to recover it. It does not address the regulator's approval of the liquidation plan. These record-based showings stand unanswered. The Trustee instead attacks Mr. Schiff's "public persona," his "commercial brand," and his "post-settlement tantrum." Opposition at 4, 18.

There is a reason for the Trustee's silence. Two months before the filing of the Verified Complaint, Qenta sent the Trustee written notice terminating the PAA. Notably, Qenta blamed *the Trustee* for the impasse. Within six days, Mr. Schiff sued Qenta to freeze and recover approximately $80 million in EPB customer assets. The Trustee thus held every fact that exculpated Mr. Schiff before he filed this suit. His answer to that record-based argument is simply that Mr. Schiff's suit against his alleged co-conspirator was "reactive damage control." Opposition at 5–6.

That is the Opposition in a nutshell. While the Motion attaches over a dozen exhibits, the Opposition refuses to squarely engage with its substance. And the Trustee's answer to that imbalance of proof has been to try to end the inquiry rather than meet it. First, the Trustee answered the Motion with adjectives and characterizations about Mr. Schiff's motives, characterizing his filings as a tantrum, then by opposing Mr. Schiff's leave to file this Reply (Docket No. 102), and throughout by urging the Court to rule on mootness rather than the merits of the request for sanctions. A litigant confident in his pleading does not work this hard to keep it from being scrutinized. So too with the Opposition's suggestion that Mr. Schiff sought to "influence (and perhaps even interfere with)" the Settlement Agreement. The Trustee attaches no communication and cites no record, resting the charge on the qualifier "perhaps" alone, and the conduct he gestures at postdates the Verified Complaint by eight months, bearing on nothing that is relevant to the Court's Rule 11 analysis.

Rule 11 asks not whether the filer has mixed motives in requesting sanctions, but whether the Verified Complaint had objectively reasonable factual and legal support when it was filed. The Trustee's inability to supply that support now, after full briefing, his own sworn declaration, and four years of unfettered access to the bank's records and systems, confirms it was never there. At a minimum, the Court should grant the limited discovery and evidentiary hearing the Motion requested and the Opposition never opposed.

II. ARGUMENT

A. Dismissal with prejudice does not moot Mr. Schiff's request for sanctions.

The Trustee's one genuinely new argument, that the case's dismissal with prejudice moots the Motion, is foreclosed by the very case he cites in support of his proposition. Specifically, the Trustee cites *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384 (1990), for the proposition that the "central purpose of Rule 11 is to deter baseless filings." Opposition at 17. But the holding of *Cooter & Gell* is that a district court retains jurisdiction to impose Rule 11 sanctions *after* the underlying action is dismissed; indeed, even after a voluntary dismissal. 496 U.S. at 395–98.

The Trustee's argument also ignores half of what Rule 11 does. A Rule 11 sanction "usually serves two main purposes: deterrence *and* compensation." *Navarro-Ayala v. Nunez*, 968 F.2d 1421, 1426 (1st Cir. 1992). The Court may award the fees "directly resulting from" the misrepresentations. *Goodyear Tire & Rubber Co. v. Haeger*, 137 S. Ct. 1178, 1186 n.5 (2017). "Nothing left to deter" does not reach the fees Mr. Schiff was forced to incur defending a pleading the Trustee knew to be false because fees and costs already incurred do not evaporate because the case settled.

Finally, by the letter of Rule 11, the violation is measured at the moment of filing and advocacy, not at dismissal. A dismissal procured by settlement between *other* parties, Mr. Schiff did not sign the Settlement Agreement, and was dismissed without his participation, says nothing about whether the allegations against Mr. Schiff had support on September 16, 2025. Tellingly, the Trustee's decision to brief the point of mootness twice (Opposition at §IV; Docket No. 102) confirms that whether the settlement mooted the request for sanctions is a live, contested issue the Court must decide. If a legal issue is simple enough to dismiss without a response, it does not warrant two briefs to justify that dismissal.

B. Records in the Trustee's possession prior to filing directly refute his central theory of liability against Mr. Schiff.

The Trustee's core theory of liability is that Mr. Schiff and Qenta were co-conspirators in a scheme to defraud EPB's customers. Records in the Trustee's own possession when he verified the Complaint reflect the opposite.

On July 11, 2025, Qenta sent the Trustee formal notice terminating the PAA. The letter was addressed to the Trustee and copied to his counsel of record. Mr. Schiff acted within *six days* of the same termination notice. He moved in this District to freeze and recover approximately $80 million in EPB customer assets; when that motion was denied on standing grounds, he re-filed in New York and obtained a temporary restraining order from Justice Jamieson, who found a likelihood of success on the merits. The TRO was affirmed by Judge Castel in New York and later vacated only because Mr. Schiff, as shareholder of EPB, lacked standing — not for any want of evidence, and not for any finding of wrongdoing. *See* Docket No. 14 at §II(B); *see also* Docket No. 14, Exhs. 1–3. The Trustee, who indisputably *did* have standing, was invited by that ruling to step into the litigation. He declined, waited, and sued Mr. Schiff, the one person who had acted, and labeled him a criminal.

It is not possible to reconcile this record with a conspiracy. One does not spend months and hundreds of pages litigating across two jurisdictions to enjoin and claw back $80 million if one's aim is to *steal* that same $80 million. The Trustee's answer, that Mr. Schiff's suits against Qenta were "reactive damage control," is not a denial that the suit happened or that he had knowledge of it prior to filing the Verified Complaint. The Trustee concedes the point but attempts to spin it by speculating about Mr. Schiff's motive in filing suit. Motive is irrelevant. The Trustee had knowledge of the fact that Mr. Schiff had sued his alleged co-conspirators to attempt to recoup the very assets he is now accused of attempting to steal. Yet, the Verified Complaint did not mention it. Months later, the Trustee still cannot put forth a reasonable explanation why this was so.

This is dispositive of Rule 11(b)(3). The Trustee omitted Mr. Schiff's litigation against Qenta from a complaint that attached hundreds of pages of exhibits was not an oversight. This is plainly a deliberate omission of the single fact that collapses the pleading's premise.

C. The Trustee's Opposition fails to address the deliberate falsehoods identified in the Motion.

The Opposition leaves the discrete, exhibit-backed showings in Mr. Schiff's Motion unrebutted. Each rests on a document in the record, and the Court may take the underlying facts as established on this record.

First, the issue with the silver exposes the incoherence at the center of the Trustee's theory. The Verified Complaint represents that the Trustee "has been able to preserve the customers' silver holdings" because they "remain under the custody of a third-party custodian in Singapore… outside Defendants' direct control." Verified Complaint, ¶ 56. The record shows that it was Mr. Schiff who acted to recover that silver from Qenta's control and who offered repeatedly to effect its transfer to customers. Docket No. 14 at 5–6 & Exhs. 4–6; Exhs. 2–3. The Opposition does not engage the point. A defendant who labors to claw an asset back from the alleged scheme is not a participant in it, and the Trustee possessed every document establishing as much before he verified the Complaint.

Second, the Verified Complaint alleged the bank's website "remained under the control of Schiff and/or Qenta" during the period of the alleged joint statements. Docket No. 1, ¶ 28. The Motion showed Qenta controlled the domain from September 30, 2022 until late July 2025, when Mr. Schiff regained access. Motion at 7–8, 13. The Opposition does not defend the allegation. It pivots to communications Mr. Schiff sent *to the Trustee* — a different subject entirely. The factual predicate for the "joint statements" charge is abandoned.

Third, the Complaint intimates the Voluntary Liquidation Plan was an instrument of fraud. The Motion showed the Plan was reviewed, revised, and *approved* by both OCIF and the Trustee himself. Motion at 13. The Opposition never engages the approval. A plan the regulator and the Trustee approved cannot simultaneously be the scheme they were defrauded by.

Fourth, the Verified Complaint alleged that Mr. Schiff and/or Qenta retained control over customer data, obstructing access by regulators and complicating the liquidation. Docket No. 1, ¶ 41. The Motion showed that Mr. Schiff repeatedly and explicitly offered to provide the Trustee with all information in his possession. Motion at 13; Exhs. 1–3. The Opposition does not acknowledge the offers, does not dispute the June 30, 2022 transfer of control, and does not explain how a defendant who volunteered his records obstructed access to them.

Where a movant's record-based showings go unaddressed, the supporting facts stand unrebutted, and the Court may take them as established for purposes of this Motion. The Court may treat these unrebutted, record-based showings as established. *See United States v. Zannino*, 895 F.2d 1, 17 (1st Cir. 1990) (Holding "issues adverted to in a perfunctory manner, unaccompanied by some effort at developed argumentation, are deemed waived.")

Beneath the specific falsehoods identified above lies a more pervasive defect that the Opposition never confronts: the Trustee's reliance on undifferentiated group pleading. Across twenty-two pages, the Opposition refers to "Defendants," to "Schiff, Qenta, and related parties," and to "Defendants' conduct," almost never separating Mr. Schiff's alleged role from Qenta's. Rule 9(b) does not permit this. In a fraud action, allegations must be pleaded with particularity as to each defendant. *DiVittorio v. Equidyne Extractive Indus.*, 822 F.2d 1242, 1247 (2d Cir. 1987). The

Trustee's recourse to collective formulations is not a stylistic choice. It is a consequence of the absence of Schiff-specific evidence.

Finally, and perhaps most importantly, the Trustee's Opposition for the first time raises a broad operational allegation, that Mr. Schiff "stood at the very center of the migration process," Opposition at 9. This allegation, which the Trustee did not include in his Verified Complaint and now makes for the first time in his Opposition, is contradicted by direct testimony from inside Qenta itself. Mr. Luiz Gustavo Rezende Schober, who served as a Sales and Trading Manager on the trading desk at EPB from July 2015 through July 2022 and then at Qenta from September 2022 through June 2024, can attest to the fact that customer migration was directed exclusively by the Trustee and Qenta; that employees engaged in migration work were instructed by both the Trustee and Qenta not to take direction from Mr. Schiff; and that Mr. Schiff in fact had no operational role in the customer migration, customer onboarding, account reconciliation, or asset-transfer processes. ***See*** **Exhibit 1** (Declaration of Luiz Gustavo Rezende Schober).

The Trustee's contemporaneous instruction to operations personnel, that Mr. Schiff was outside the migration apparatus, cannot be reconciled with a verified pleading swearing that he stood at its center. Nor does the Trustee's "public face" theory rescue the allegation: lending one's name to a transaction the regulator and the Trustee themselves approved is not participation in a racketeering scheme, and the Opposition identifies no statement by Mr. Schiff during the migration period that was both his own and false. Because it is the Opposition that recast Mr. Schiff as standing "at the very center of the migration process," Opposition at 9, this rebuttal is squarely within the proper scope of reply. The Trustee's pre-filing conduct thus contradicts the Trustee's pre-filing knowledge, and the contradiction is itself evidence of the Rule 11(b)(3) violation and of the Rule 11(b)(1) improper purpose.

D. The Motion does not allege a "competing narrative," but a pattern of deliberate falsehoods.

The Trustee's principal legal refrain is that Rule 11 "does not authorize sanctions merely because a defendant offers a competing narrative," and that allegations are not "verifiably false" simply because a defendant disputes them. Opposition at 12–13. The Opposition recites both propositions without any supporting authority.

Every authority the Trustee marshals in his Opposition involves information the plaintiff genuinely lacked at filing. This case presents the opposite scenario. The Trustee possessed all bank-related information prior to filing suit. He did not lack any information. He controlled the bank's records for three years. He received the termination letter. He had Mr. Schiff's entire litigation record against Qenta months before he prosecuted his claims. The information asymmetry his cited cases depend on runs in the opposite direction.

This is therefore not a quarrel between two reasonable inferences drawn from the same ambiguous facts. Mr. Schiff came forward with affirmative, documentary proof of the suits against Qenta, the silver recovery, and the website timeline, each of which the Trustee possessed or could trivially access, and each of which he ignored. That is not advocacy of a competing view, it is "clos[ing] [one's] eyes to the overwhelming evidence" that the pleading was untrue. *Patsy's Brand, Inc. v. I.O.B. Realty, Inc.*, 2002 WL 59434, at *1 (S.D.N.Y. 2002).

The Trustee's insistence on his own thoroughness in investigating the case defeats his excuse. A litigant who touts his "extensive investigation" in defense of his demonstrably false allegations confirms one of two things—either his investigation was wholly inadequate, or he is acting in bad faith. "A pure heart no longer excuses an empty head," and only culpable carelessness, not bad faith, is required to award sanctions. *Lancellotti v. Fay*, 909 F.2d 15, 19 (1st Cir. 1990); *Cruz v. Savage*, 896 F.2d 626, 634 (1st Cir. 1990).

E. The legal theories remain baseless, and the Opposition defends the statutes rather than their application to Mr. Schiff.

The Motion argued the Trustee's Verified Complaint is sanctionable because its legal theories are utterly baseless and there is no reasonable basis for the Trustee's counsel to have believed Mr. Schiff's actions were violative of the CEA or RICO. Regarding the Motion's arguments on the RICO claim—no cognizable enterprise, no pattern of racketeering, and no fraud pleaded with particularity under Rule 9(b)—the Opposition answers one sliver of one ground — that scienter may be alleged generally under Rule 9(b). Opposition at 13–14. But Rule 9(b)'s general-allegation allowance is for state of mind only; the circumstances constituting the fraud must still be pleaded with particularity, as required by Rule 9(b). The Opposition never identifies an enterprise, never identifies a pattern, and never identifies a single misrepresentation by Mr. Schiff. On a motion that put all three squarely in issue, that silence concedes the RICO theory had no factual basis as to Mr. Schiff.

More fundamentally, the Trustee's RICO architecture is structurally defective as to Mr. Schiff. Mr. Schiff is named in only one RICO count — Count III, the § 1962(d) conspiracy claim. His supposed "agreement" rests entirely on signing the PAA and on undefined "subsequent coordinated actions." Docket No. 1, ¶¶ 77–79. The PAA, however, was reviewed and approved by both OCIF and the Trustee himself. Declaration ¶¶ 34, 46. A transaction approved by the regulator and the court-appointed fiduciary cannot supply the "agreement" necessary to sustain a § 1962(d) claim against the seller.

Similarly, the Motion showed that the private right of action under the Commodity Exchange Act requires conduct falling within one of four narrowly defined transactional categories, and that Mr. Schiff is not alleged to have engaged in any of them. Motion at 17. The Opposition responds with tonnage — ounces of gold, ounces of silver — and the bare assertion that the CEA is “well-established.” Opposition at 8–9, 14. It never addresses the four-category requirement. It conflates the existence of the statute with its application to this defendant. On these facts, no reasonable inquiry could have produced a CEA claim against Mr. Schiff; pleading one was not merely insufficient, it was frivolous.

The verified pleadings confirm the point. The *only* “misrepresentations” the Trustee attributes to Mr. Schiff appear at paragraph 84 of his declaration, and the Trustee concedes they were made *after* Qenta terminated the PAA, while Mr. Schiff was suing Qenta to recover the assets. The statements themselves are not deceptive; they are calls to action urging customers to press the Trustee to pursue Qenta for the release of their property. A man does not defraud customers by telling them to reclaim the very assets he is allegedly conspiring to steal.

F. Limited discovery and an evidentiary hearing are necessary to properly dispose of this matter.

If the Court is not inclined to grant sanctions on the present record, the Opposition itself supplies the reason to order limited discovery and a hearing. The Trustee's two defenses cannot coexist. He argues, on one hand, that the Verified Complaint was "the product of an extensive investigation," supported by audited statements and "over 300 pages of documentary support." Opposition at 2, 6–7. He argues, on the other, that the key facts "resided almost entirely in the possession of Defendants" and could not be known before discovery. Opposition at 12. Both cannot be true. If the investigation was exhaustive, the Trustee had access to proof of the falsity of his allegations against Mr. Schiff. If the facts were beyond his reach, he pleaded a RICO and CEA conspiracy without evidence, which is a textbook Rule 11(b)(3) violation. Either branch warrants discovery into what the Trustee's pre-filing file contained.

The same logic applies to the hearing requested by Mr. Schiff. The Trustee insists that intent, knowledge, and participation in a scheme cannot be resolved before discovery because they lie within the parties' control. Opposition at 12–14. Applied symmetrically, that standard requires discovery into the Trustee's reasons for filing this suit. Whether his pre-filing inquiry was objectively reasonable, measured by "the complexity of the subject matter, the party's familiarity with it, the time available for inquiry, and the ease of access to the requisite information," *CQ Int'l Co. v. Rochem Int'l, Inc.*, 659 F.3d 53, 62–63 (1st Cir. 2011), is a question of fact a hearing exists to resolve. *Baker v. Alderman*, 158 F.3d 516, 525–26 (11th Cir. 1998); *Sea Village Marina, LLC v. A 1980 Carlcraft Houseboat*, 2010 WL 338060, at *6 (D.N.J. 2010). Having sworn that an "extensive investigation" established Mr. Schiff's agreement to a racketeering scheme, the Trustee has produced none of it, and he cannot withhold that evidence while resisting the discovery that would test whether it ever existed.

The improper-purpose showing stands unrebutted and sharpens the need for the requested discovery. The Motion documented that the Trustee's counsel blocked Mr. Schiff's email (Exhs. 14–15) and that OCIF's counsel issued a cease-and-desist in response to his advocacy (Exh. 16). The Opposition does not address either exhibit. The Trustee, who claims he "had a duty to act quickly," waited more than two months after the termination notice to file this suit, then sued the one party who had already acted. Discovery is the appropriate vehicle for resolving that contradiction.

Finally, the Opposition's assertion that Mr. Schiff "threatened" Rule 11 sanctions as settlement leverage mischaracterizes the record. The Motion had been served in full compliance with Rule 11's safe harbor before any settlement discussion. In the course of resolving the case, Mr. Schiff offered to withdraw the already-pending Motion as part of a global resolution that would have secured specific protections for EPB customers. The Trustee declined. Offering to withdraw a properly filed motion is a settlement overture, not a threat to file one, and recasting it as evidence of improper purpose inverts what actually happened.

G. The Trustee's own settlement refutes the racketeering narrative.

The Trustee argues that "frivolous controversies do not produce settlement structures of this magnitude." Opposition at 15–16. But Mr. Schiff did not settle, and the settlement was with Qenta. The complexity of a Qenta resolution is no measure of whether the allegations against *Mr. Schiff* had any basis. The argument confuses the size of the dispute with the merit of the claim against a particular defendant.

Moreover, the executed Settlement Agreement[1], which the Trustee himself put in issue, describes this dispute, in its own recitals, as the product of "regulatory requirements, operational challenges, and disputes between the Parties" and "delays in the implementation" of a commercial agreement. Not a word of fraud, racketeering, or scheme. The same instrument provides that nothing in it is an admission of wrongdoing by anyone (Settlement Agreement, § 1.2), releases Qenta, the supposed lead racketeer, in full, and binds the Trustee to refrain from disparaging the very parties he branded a criminal enterprise. The Trustee's footnote acknowledging that Qenta "ultimately worked cooperatively" with him (Opposition at 2 n.1) cannot be reconciled with a verified pleading that cast Qenta as the hub of a $50 million RICO conspiracy. A coordinated racketeering scheme does not end in a global release and a mutual promise not to speak ill of the racketeers.

The point is sharpened by the Trustee's treatment of Brent de Jong. Mr. de Jong, the individual whom the Verified Complaint identified as the Qenta principal and as Mr. Schiff's alleged co-conspirator, was dismissed with prejudice and personally released, despite not being a

[1] Mr. Schiff notes that, despite the Court's order, the Trustee did not send him a copy of the restricted filing containing the executed agreement.

party to the Settlement Agreement. The Trustee thus extended a personal release to the individual he had identified as the architect of the alleged racketeering enterprise. If Mr. de Jong's conduct merited a personal release the Trustee received nothing for, the conspiracy in which Mr. Schiff is alleged to have participated did not exist as the Verified Complaint described it. There is no conspiracy of one.

Nor does the substance of the settlement support the Trustee's claim that its "magnitude" reflects the strength of his case. The settlement left a discount on customer-owned gold in place, left over $10 million in mutual fund assets under Qenta's control, and left non-reverse-migrated customer property in Qenta's possession past the 60-day window. Those are not terms a fiduciary extracts from a racketeering enterprise alleged to have stolen $50 million from customers.

H. Rule 11 does not require proof of legal harm.

The Trustee says Mr. Schiff "suffered no cognizable legal harm." Docket No. 99 at 18. That is not the standard, and the harm is self-evident: a government-appointed fiduciary labeled a nationally known financial commentator and asset manager, whose business depends on customer trust in his management of their assets, a racketeer in a verified federal pleading. Rule 11 polices exactly this injury, because a civil RICO charge carries "an almost inevitable stigmatizing effect" on those it names. *Katzman v. Victoria's Secret Catalogue*, 167 F.R.D. 649, 660–61 (S.D.N.Y. 1996). The Trustee's repeated emphasis on Mr. Schiff's public profile emphasizes the magnitude of the harm caused by his baseless filing.

The Trustee's own filings confirm his awareness of these stakes. He characterized Mr. Schiff's response to the Verified Complaint as directed "at what seems to be a public effort to manage and protect his personal reputation and public image, a concern especially acute given his status as a known financial commentator, media personality, and public figure whose personal brand are [sic] built upon public trust and perception." Docket No. 25 at 1. The Opposition repeats the theme, deriding Mr. Schiff's "public persona" and "commercial brand." Opposition at 4, 18. A litigant who knew, before filing, the precise reputational stakes of his pleading and who nevertheless chose to level unsupported federal racketeering allegations against an individual whose livelihood depends on his fiduciary credibility cannot now invoke the very harm he intended to inflict as a reason to defeat sanctions. The knowing infliction of reputational damage on a named defendant, by a government-appointed fiduciary, through a verified federal complaint the filer's own sworn record does not support, is the improper purpose Rule 11(b)(1) was written to deter.

WHEREFORE, Defendant Peter D. Schiff respectfully requests the Court **GRANT** his Motion for Sanctions as requested, or, alternatively, order limited discovery and an evidentiary hearing.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico on this June 15, 2026.

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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