

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRUNO JOSEPH CUA

Criminal Action No. 21-00107 (RDM)

DEFENSE COUNSEL'S MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 44.5(d), undersigned counsel hereby request leave to withdraw as counsel for Defendant Bruno Joseph Cua in this matter.

In support of this motion, counsel states as follows:

1. Undersigned counsel entered their appearances in this case as retained counsel on February 10 and 26, 2021. ECF Nos. 5 & 10.
2. Recently, the attorney-client relationship between counsel and Mr. Cua has become irretrievably broken due to a fundamental disagreement regarding legal issues and a course of action. Counsel cannot disclose further information regarding the disagreement without divulging client confidences but represents that this disagreement is irreconcilable despite counsel's best efforts to resolve it. *See* D.C. Rule Prof. Conduct 1.16 cmt. 3.
3. Mr. Cua terminated counsel's representation on July 14, 2022, and consents to this motion.
4. Counsel has discussed the situation with Mr. Cua, who wishes to proceed pro se at this time.¹

¹ Counsel has also discussed with Mr. Cua the requirement under Local Rule 44.5(d) that counsel effect personal service of the motion on the client or service at the client's last known address.

5. It is still relatively early in these proceedings. Although the Court has requested the parties' availability for trial, no trial date has been set at this time this motion is being filed and counsel's best understanding is that any trial would be set several months from now in 2023.

Wherefore, for the foregoing reasons, undersigned counsel respectfully requests that the Court enter the attached order granting counsel leave to withdraw from its representation of Mr. Cua in these proceedings.

Respectfully submitted,

DATED: July 18, 2022

/s/ William E. Zapf
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Attorneys for Bruno Joseph Cua

Mr. Cua agrees to waive this requirement and accept service by email, which counsel is doing contemporaneously with filing this motion.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 2022, I filed the foregoing with the Clerk of the United States District Court for the District of Columbia by using the CM/ECF system, which system I understand has provided electronic notice counsel of record. Mr. Cua has waived personal service and accepted service of this motion by email.

Dated: July 18, 2022

/s/ William E. Zapf
William E. Zapf