

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	CASE NO. 21-CR- 107 (RDM)
	:	
	:	
BRUNO JOSEPH CUA,	:	
	:	
Defendant.	:	
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JOINT PROPOSED PRETRIAL ORDER

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Bruno Joseph Cua, by and through his attorneys, William Zapf and Jon Jeffress, now submit this joint proposed pretrial order, requested by the Court on July 28, 2022.

Trial is set to commence in this matter on **February 13, 2023, at 9:00 a.m.**, in Courtroom

8. The parties propose the following deadlines to govern pre-trial proceedings:

1. The parties shall submit any pretrial motions, other than motions in *limine*, on or before November 21, 2022. Oppositions shall be filed on or before December 7, 2022. Replies shall be filed on or before December 14, 2022.
2. The parties shall make any expert disclosures pursuant to Federal Rule of Criminal Procedure 16 on or before November 21, 2022. Any oppositions to proposed experts shall be filed on or before December 7, 2022. Any replies shall be filed on or before December 14, 2022.

3. A pretrial motions hearing, if necessary to address the above motions, will be held on January 11, 2023.
4. The government shall notify the defense of its intention to introduce any Rule 404(b) evidence on or before December 19, 2022. Oppositions shall be filed on or before January 6, 2023. Replies shall be filed on or before January 13, 2023.
5. Motions in *limine* shall be filed on or before January 9, 2023. Oppositions shall be filed on or before January 23, 2023. Replies shall be filed on or before January 30, 2023.
6. The United States shall produce grand jury and Jencks Act disclosures as to each witness it expects to call in its case-in-chief on or before January 23, 2023. Any *Brady* material not already disclosed must also be disclosed by that date.
7. In an effort to resolve as many evidentiary and witness issues as possible in advance of trial, the government will provide defense counsel with a courtesy copy of its proposed witness list and exhibit list by January 25, 2023. It shall also provide counsel with courtesy copies of each exhibit from the list by January 25, 2023. Defense counsel shall notify the government in writing of any specific objections to the admissibility and/or authenticity of any such exhibit by February 1, 2023. In addition, the defense reserves the right to file additional motions in *limine* upon receipt of the exhibit and witness list provided that any such motion is based on information or evidence not previously made available to the defense.
8. On or before January 30, 2023, counsel shall file a Joint Pretrial Statement that contains the following:

- a. The parties' positions on the need for an order under Local Criminal Rule 57.7(c).
 - b. A neutral statement of the case, to be read to prospective jurors.
 - c. Proposed or modified voir dire questions.
 - d. Proposed jury instructions.
 - e. Proposed verdict form.
9. The parties shall appear on February 6, 2023 for a Pretrial Conference.

Date: August 18, 2022

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

BY: /s/
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