

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

UNITED STATES OF AMERICA

v.

BRUNO JOSEPH CUA

Criminal Action No. 21-00107 (RDM)

CONSENT MOTION TO EXTEND PRETRIAL DEADLINES

Bruno Joseph Cua, through undersigned counsel, hereby moves this Honorable Court for an Order extending the deadlines for the parties to submit pretrial motions, other than motions in limine, and for the parties to make any expert disclosures pursuant to Federal Rule of Criminal Procedure 16, each by two weeks, with accompanying extensions for the response and reply deadlines. Mr. Cua requests these extensions due to a death in the family of the primary counsel responsible for these submissions and resulting obligations that have required counsel to be out of the office. Counsel for the government has stated that the government does not oppose the requested relief.

In support of this motion, Mr. Cua states as follows:

1. On August 22, 2022, the Court entered a Minute Order setting the pretrial schedule in this case. Among other deadlines, the Order set a deadline of November 21, 2022, for the parties to submit pretrial motions, other than motions in limine, and to make any required expert disclosures pursuant to Federal Rule of Criminal Procedure 16. The schedule also set deadlines of December 7, 2022, for oppositions to the submissions and December 14, 2022, for any replies. Trial in this case is currently set to begin on February 13, 2023.

2. Mr. Cua's primary counsel responsible for these submissions experienced the death of a close family member on October 26, 2022. This has required counsel to be out of the office and/or unavailable to work for significant periods of time, not only for the services, but also to attend to the business affairs and the estate of the family member, which have required immediate, extended attention in this case.

3. Mr. Cua respectfully requests that the Court issue an order granting an extension of the above-discussed deadlines, as follows:

Pretrial motions, other than motions in limine	December 5, 2022
Expert disclosures pursuant to Fed. R. Crim. P. 16	December 5, 2022
Oppositions to pretrial motions	December 19, 2022
Oppositions to expert disclosures	December 19, 2022
Replies in support of pretrial motions	December 30, 2022
Replies in support of expert disclosures	December 30, 2022

4. This is Mr. Cua's first request to extend any pretrial deadlines. The requested extensions will not unduly delay preparation of this case for trial.

5. Undersigned counsel has exchanged emails with counsel for the government, Assistant United States Attorney, Kaitlin Klamann, who has indicated that the government does not oppose the requested relief.

For the above-stated reasons, Mr. Cua respectfully requests that the Court grant the requested extensions. A proposed order accompanies this motion.

Respectfully submitted,

DATED: November 11, 2022

/s/ William E. Zapf

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of November 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.

Dated: November 11, 2022

/s/ William E. Zapf

William E. Zapf