

**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 Mr. Cua to file reply briefs in support of his pretrial motions and reply in support of his expert disclosures pursuant to Federal Rule of Criminal Procedure 16, by two business day, from December 30, 2022, to January 4, 2023. Mr. Cua requests this extension due to personal circumstances that have required primary counsel responsible for these submissions to be out of the office this week. 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. On November 11, 2022, the Court entered a Minute Order granting the defense's consent motion to extend the deadlines for pretrial motions and Rule 16 expert disclosures to

December 5, 2022, oppositions to those motions and disclosures to December 19, 2022, and any replies for those motions and disclosures to December 30, 2022. Counsel had requested the extensions due to a death of a close family member of primary counsel responsible for those submissions, including 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's counsel has again been required to be out of the office and out of town this week to attend further to the business affairs and estate of his deceased family member and needed to do so this week to coincide with the holiday break of his school-aged children. Due to the Christmas holiday and this travel, counsel respectfully requests this short extension of two business days, until January 4, 2023, to file replies in support of his pretrial motions and expert disclosure.

4. This is Mr. Cua's second request to extend 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 object to 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: December 27, 2022

/s/ William E. Zapf

Jonathan Jeffress (D.C. Bar No. 479074)

William E. Zapf (D.C. Bar No. 987213)

KaiserDillon PLLC

1099 14th Street NW

8th Floor West

Washington, DC 20005

T: (202) 640-2850

F: (202) 280-1034

jjeffress@kaiserdillon.com

wzapf@kaiserdillon.com

Attorneys for Bruno Joseph Cua

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December 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: December 27, 2022

/s/ William E. Zapf

William E. Zapf