

**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 TIME TO SERVE
OBJECTIONS TO GOVERNMENT TRIAL EXHIBITS**

Bruno Joseph Cua, through undersigned counsel, hereby moves this Honorable Court for an order granting a two-day extension of time to notify the government in writing of any specific objections to the admissibility or authenticity of the government's trial exhibits. Under the current pretrial schedule, the deadline for Mr. Cua to serve specific objections to the government's trial exhibits is today, February 1, 2023. *See* Aug. 22, 2022 Minute Order. Mr. Cua respectfully requests that he be granted a two day extension to serve such objections, until February 3, 2023.

Undersigned counsel has spoken with counsel for the government, who has stated that the government consents to the requested extension.

A bench trial in this case is currently scheduled to begin on February 13, 2023. Granting the requested extension will not adversely affect the preparation of the case for trial.

Respectfully submitted,

DATED: February 1, 2023

/s/ William E. Zapf

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

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

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Attorneys for Bruno Joseph Cua

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February, 2023, 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: February 1, 2023

/s/ William E. Zapf

William E. Zapf