

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

**UNITED STATES OF AMERICA**

**v.**

**BRUNO JOSEPH CUA**

**Criminal Action No. 21-00107 (RDM)**

**DEFENDANT'S RESPONSE TO APPLICATION FOR ACCESS TO VIDEO EXHIBITS**

Bruno Joseph Cua, through undersigned counsel, and pursuant to the Court's May 2, 2023 Minute Order, hereby notifies the Court of his position with respect to the application for access to video exhibits, filed on April 20, 2023. See ECF No. 325.

Mr. Cua has no objection to providing access to the requested videos to the applicants. Mr. Cua respectfully requests that the Court permit access under a protective order limiting dissemination of the videos to the parties in the case for which they are being requested.

Respectfully submitted,

DATED: May 9, 2023

*/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 9th day of May, 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.

*/s/ William E. Zapf*

William E. Zapf