

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

UNITED STATES OF AMERICA

v.

BRUNO JOSEPH CUA

Criminal Action No. 21-00107 (RDM)

NOTICE OF INTENT TO FILE PRELIMINARY BRIEF

Bruno Joseph Cua, through undersigned counsel, hereby submits the following notice of his intent to file a preliminary brief in support of a motion to dismiss Count 2 of the Superseding Indictment, charging him with violating 18 U.S.C. §§ 1512(c)(2) & 2. At the status conference on October 26, 2021, counsel for Mr. Cua stated his intention to file a motion to dismiss Count 2. The Court set a briefing schedule making such motion due by December 1, 2021. The Court noted, however, that a similar motion regarding section 1512(c)(2) had been filed and was pending before him in another case¹ and stated that Mr. Cua may file a preliminary brief earlier if he wanted to raise points or authorities for the Court to consider that may not have been addressed in that other case.

Mr. Cua files this notice to notify the Court in advance that he intends to file such a preliminary brief as soon as possible and no later than November 16, 2021.

¹ Mr. Cua understands that the similar motion concerning section 1512(c)(2) is pending before Your Honor in *United States v. Montgomery, et al.*, Case No. 1:21-cr-00046-RDM.

Respectfully submitted,

DATED: November 12, 2021

/s/ William E. Zapf
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Attorneys for Bruno Joseph Cua

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November 2021, 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 12, 2021

*/s/ William E. Zapf*_____

William E. Zapf