

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

ZTE CORPORATION,

*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

NO. 3:17-CR-0120-K

**ZTE CORPORATION’S RESPONSE TO COURT’S ORDER REGARDING SEALING**

Pursuant to the Court’s Order of March 3, 2022, Dkt. 158, Defendant ZTE Corporation hereby states that it agrees with the Government that the revocation hearing now set for March 14, 2022, which relates to the alleged conspiracy to commit visa fraud as asserted in the separate, March 18, 2021 indictment of former ZTE (TX) Inc. employee Dr. Jianjun Yu in 1:21-cr-00109 (N.D. Ga.), should be a public hearing.

DATED: March 4, 2022

Respectfully submitted.

Michael P. Gibson (SBN 07871500)  
Paul T. Lund (SBN 24070185)  
BURLESON, PATE & GIBSON LLP  
Founders Square  
900 Jackson Street, Suite 330  
Dallas, TX 75202  
(214) 871-4900  
mgibson@bp-g.com  
plund@bp-g.com

J. Evans Rice III (admitted pro hac vice)  
Stephen F. Propst (admitted pro hac vice)  
HOGAN LOVELLS US LLP  
555 13th Street, N.W.  
Washington, D.C. 20004  
(202) 637-5600  
evans.rice@hoganlovells.com  
stephen.propst@hoganlovells.com

M. Scott Barnard (SBN 24001690)  
Brennan H. Meier (SBN 24077507)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
2300 N. Field St., Suite 1800  
Dallas, TX 75021  
(214) 969-2800  
sbarnard@akingump.com  
bhmeier@akingump.com

/s/ Robert C. Walters  
Robert C. Walters (SBN 20820300)  
Allyson N. Ho (SBN 24033667)  
Kyle D. Hawkins (SBN 24094710)  
Betty X. Yang (SBN 24088690)  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201  
(214) 698-3100  
rwalters@gibsondunn.com  
aho@gibsondunn.com  
khawkins@gibsondunn.com  
byang@gibsondunn.com

F. Joseph Warin (admitted pro hac vice)  
John W.F. Chesley (admitted pro hac vice)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue N.W.  
Washington, D.C. 20036  
(202) 955-8500  
jwarin@gibsondunn.com  
jchesley@gibsondunn.com

ATTORNEYS FOR ZTE CORPORATION

**CERTIFICATE OF SERVICE**

This is to certify that on March 4, 2022, a true and correct copy of the foregoing ZTE Corporation's Response to Court's Order Regarding Sealing, was electronically filed with the Court using CM/ECF, which will send notification of this filing to counsel of record in the above-captioned case.

/s/ Robert C. Walters  
Robert C. Walters