

FILED
CLERK'S OFFICE
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
2015 APR 16 PM 4 35
FILED UNDER SEAL
U.S. DISTRICT COURT
DISTRICT OF MASS.

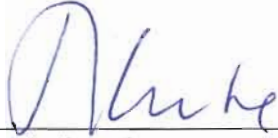
UNITED STATES OF AMERICA,)
)
v.) CRIMINAL NO. 13-10200-GAO
)
DZHOKHAR TSARNAEV)

**SEALED MOTION TO SEAL DEFENDANT'S LIST OF MITIGATING
FACTORS AND REQUEST REGARDING PRELIMINARY INSTRUCTIONS**

Defendant moves that the Court file the instant motion and the attached
Defendant's List of Mitigating Factors and Request Regarding Preliminary Instructions
under seal. The information has been the subject of in camera proceedings.

Respectfully submitted,

DATED: April 16, 2015



David I. Bruck
Judy Clarke
Miriam Conrad
William Fick
Timothy Watkins

Certificate of Service

I hereby certify that this document was served by email on April 16, 2015 upon
counsel for the government.