

[FILED UNDER SEAL]

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2015 APR 20 PM 12 52

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA)

v.)

DZHOKHAR TSARNAEV)

CRIMINAL NO. 13-10200-GAO

**SEALED MOTION FOR LEAVE TO FILE
DEFENDANT'S OPPOSITION TO PUBLIC DISCLOSURE OF
PENALTY PHASE WITNESS LISTS UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests that the Court grant him leave to file his Opposition to Public Disclosure of Penalty Phase Witness Lists under seal.

As grounds therefore, the defendant states that the filing relates to matters discussed during a sealed lobby conference on April 17.

Respectfully submitted,

/s/ Miriam Conrad

David I. Bruck

Judy Clarke

Miriam Conrad

William Fick

Timothy Watkins

Counsel for Dzhokhar Tsarnaev

Certificate of Service

I hereby certify that I have caused this document to be served upon counsel for the United States by e-mail PDF on April 19, 2015.

/s/ Miriam Conrad