

FILED  
IN CLERKS OFFICE  
APR 22 2015  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
**FILED UNDER SEAL**

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

**SEALED MOTION TO SEAL DEFENDANT'S RESPONSE TO  
GOVERNMENT'S MOTION IN LIMINE TO EXCLUDE PENALTY-PHASE  
EXPERT TESTIMONY AND RELATED EXHIBITS**

Defendant moves that the Court grant the instant motion and the attached Defendant's Motion to Exclude Inflammatory, Cumulative, and Late-Disclosed Government Exhibits under seal. The request to seal is made according to the Court's practice of treating objections to sensitive non-public information at sidebar, and we leave any decision regarding public disclosure to the Court's discretion.

Respectfully submitted,  
DZHOKHAR TSARNAEV

By his attorneys



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DATED: April 22, 2015

**Certificate of Service**

I hereby certify that this document was served by email on April 22, 2015 upon counsel for the government.



A handwritten signature in blue ink, appearing to read "Paul F. Rin", is written over a horizontal line.