

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
**FILED UNDER SEAL**

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

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL MOTION  
TO COMPEL THE GOVERNMENT TO COMPLY WITH ITS  
EXPERT DISCLOSURE OBLIGATIONS AND EXHIBIT UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file his Supplemental Motion to Compel the Government to Comply with Its Expert Disclosure Obligations, along with the government’s August 1, 2014 disclosure letter and this Motion to Seal, under seal.

As grounds therefor, undersigned counsel state that Government’s August 1, 2014 disclosure letter is not part of the public record, refers to investigative information, and is covered by the protective order in this case [DE 91]. The letter is extensively discussed and quoted in the defendant’s Supplemental Motion.

Respectfully submitted,

DZHOKHAR TSARNAEV  
By his attorneys



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**CERTIFICATE OF SERVICE**

I, Timothy G. Watkins, hereby certify that copies of this document filed under seal have been served on Assistant U.S. Attorneys William Weinreb, Alope Chakravarty, and Nadine Pellegrini by email and will be served by hand delivery on August 6, 2014.

A handwritten signature in black ink, appearing to read 'Timothy G. Watkins', with a stylized flourish at the end.

Timothy G. Watkins