UNITED STATES 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, Dzhokhar Tsarnaev, by and through counsel, respectfully requests that the Court accept for filing under seal the appended Exhibit 3 to the defendant's Memorandum in Support of Second Motion to Change Venue [DE 686]. In support of this motion, the proferred Exhibit 3 is a government expert disclosure letter which is not appropriate for placing on the public docket.

Respectfully submitted,

DZHOKHAR TSARNAEV by his attorneys

Indy Clarke Esq. (CA Bar # 76071)

Judy Clarke, Esq. (CA Bar # 76071) CLARKE & RICE, APC 1010 Second Avenue, Suite 1800 San Diego, CA 92101 (619) 308-8484 JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq. 220 Sydney Lewis Hall Lexington, VA 24450 (540) 460-8188 BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

Certificate of Service

I hereby certify I have cause a copy of this motion and appended document(s) to be served by counsel for the United States by hand delivery this 2d day of December, 2014.