UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SEALED

UNITED STATES OF AMERICA,)	
)	No. 13-CR10200-GAO
)	
)	
)	
DZHOKHAR TSARNAEV)	

SEALED MOTION FOR LEAVE TO FILE MOTION TO SUPPLEMENT AGREED-UPON QUESTIONNAIRE AND DEFENDANT'S REPLY TO THE GOVERNMENT'S MOTION TO SUPPLEMENT JURY QUESTIONNAIRE UNDER SEAL

Defendant moves that this Court grant him leave to file both the instant Motion and the attached Motions to Supplement the Agreed-Upon Juror Questionnaire and Defendant's Reply to the Government's Motion to Supplement Jury Questionnaire under seal. As grounds for this motion, undersigned counsel states that the goal of obtaining candid responses to the questions proposed in the referenced motions could be jeopardized if potential jurors obtain advance copies of it.

Respectfully submitted,

DAVID I. BRUCK

JUDY CLARKE

MIRIAM CONRAD

WILLIAM FICK

TIMOTHY WATKINS

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DATED: December 3, 2014

Certificate of Service

I hereby certify that this document, and the referenced attachments, were served on counsel of record by email December 3, 2014.

obert Rieske