

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS


UNITED STATES OF AMERICA	)	
	)	No. 13-CR-10200-GAO
v.	)	<b>FILED UNDER SEAL</b>
	)	
DZHOKHAR TSARNAEV	)	

**MOTION FOR LEAVE TO FILE  
MOTION TO EXCLUDE TOOLMARK IDENTIFICATION EVIDENCE  
AND REQUEST FOR DAUBERT HEARING IN EXCESS OF TWENTY PAGES**

Defendant, Dzhokhar Tsarnaev, hereby moves, pursuant to Local Rule 7.1(b)(4), for leave to file a Motion to Compel Discovery of Favorable Evidence in excess of twenty pages. As reason therefore, defendant states that the motion must address multiple issues regarding toomark identification, each requiring detailed factual and legal analysis. For this reason, defendant requests that he be allowed to exceed the ordinary twenty page limit for pleadings.

Respectfully submitted,  
DZHOKHAR TSARNAEV

By his attorneys



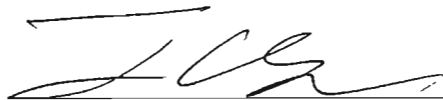
Judy Clarke, Esq. (CA Bar # 76071)  
CLARKE & RICE, APC  
1010 Second Avenue, Suite 1800  
San Diego, CA 92101  
(619) 308-8484  
JUDYCLARKE@JCSRLAW.NET

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 that this document was served on counsel for the government by email and paper copy by interoffice delivery on December 5, 2014.

  
\_\_\_\_\_  
Timothy Watkins