

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim No.13-10200-GAO
)	
DZHOKHAR A. TSARNAEV,)	<u>FILED UNDER SEAL</u>
Defendant)	

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
RESPONSE TO DEFENDANT'S MOTION TO EXCLUDE TESTIMONY
REGARDING CELLPHONE GEOLOCATION EVIDENCE UNDER SEAL**

The United States of America, by and through its undersigned counsel, respectfully requests leave to file the attached Response to Defendant's Motion to Exclude Testimony Regarding Cellphone Geolocation Evidence under seal. As grounds for this motion, the government incorporates by reference Tsarnaev's Assented-to Motion to Seal, which he filed in connection with all of his Daubert motions.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ William D. Weinreb
WILLIAM D. WEINREB
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CERTIFICATE OF SERVICE

I hereby certify that this document will be served via electronic mail to Judy Clarke, Esq., counsel for Dzhokhar Tsarnaev, on December 19, 2014.

/s/ William D. Weinreb
WILLIAM D. WEINREB