

FILED  
IN CLERKS OFFICE  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
U.S. DISTRICT COURT  
**FILED UNDER SEAL**

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

**MOTION TO SEAL  
MOTION FOR LEAVE TO FILE REPLIES TO THE GOVERNMENT’S  
OPPOSITIONS TO *DAUBERT* MOTIONS *IN LIMINE* AND FOR AN  
EXTENSION OF TIME IN WHICH TO DO SO**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file his Motion for Leave to File Replies to the Government’s Oppositions to *Daubert* Motions *in Limine* and for an Extension of Time in Which to Do So under seal. Leave to file under seal is requested because the motion concerns non-public discovery and evidentiary disclosures that are subject to the Protective Order [DE 91] in this case.

Recognizing that some or all of the materials referred to in the motion may well become public during trial, defendant requests only that the documents remain under seal until such time as public disclosure at a preadmission hearing or at trial is necessary.

Respectfully submitted,

DZHOKHAR TSARNAEV  
By his attorneys



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**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 23, 2014.



Timothy G. Watkins