

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

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 copies of this document filed under seal have been served on Assistant U.S. Attorneys William Weinreb, Alope Chakravarty, Steven Mellin, and Nadine Pellegrini by email on October 20, 2015.



Miriam Conrad

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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

FILED UNDER SEAL

**ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY TO
GOVERNMENT’S OPPOSITION TO MOTION FOR ORDER TO
MAINTAIN PROTECTION OF PRIVILEGED AND
CONFIDENTIAL DEFENSE INFORMATION AND WORK PRODUCT**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file a reply, by October 30, to the government’s Opposition to his Motion for an Order to Maintain Protection of Privileged and Confidential Defense Information and Work Product, Judgment Notwithstanding Verdict and for New Trial. Assistant U.S. Attorney William Weinreb has assented to this motion and to the proposed deadline.

As grounds for this motion, the defense states that the Opposition includes arguments that warrant responses, including but not limited to its claim that this Court lacks the authority to prevent the government from renegeing on its agreement and obtaining privileged and confidential information about the defense.

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 has been served by email PDF on counsel for the United States on October 20, 2015.



Miriam Conrad