

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
 v. ) Crim. No. 13-10200-GAO  
 )  
 DZHOKHAR TSARNAEV )

**DEFENDANT’S RESPONSE TO GOVERNMENT’S  
MOTION FOR LEAVE TO FILE INFORMATION REQUESTED  
BY THE COURT (RE: EXPERTS) UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully files his response to the Government’s Motion for Leave to File Information Requested by the Court (Re: Experts) Under Seal, DE 565.

The defendant assents to the government’s motion as the items requested by the Court. In so doing, he would respectfully direct the Court’s attention to the Declaration of William W. Fick, DE 518-6, which describes the state of the government’s production, and defense analysis, of the electronic devices and storage media in this case as of August 29, 2014, the business day before the disclosures that the government now moves to submit to the Court.

The defendant also has no objection to the filing of Item 5 in the Government’s sealed exhibit, although the Court did not request it.

Dated: September 18, 2014

Respectfully Submitted,

DZHOKHAR TSARNAEV  
By his attorneys

/s/ David I. Bruck

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

David I. Bruck, Esq. (SC Bar # 967)  
220 Sydney Lewis Hall  
Lexington, VA 24450  
(540) 458-8188  
[BRUCKD@WLU.EDU](mailto: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](mailto:MIRIAM_CONRAD@FD.ORG)  
[TIMOTHY\\_WATKINS@FD.ORG](mailto:TIMOTHY_WATKINS@FD.ORG)  
[WILLIAM\\_FICK@FD.ORG](mailto:WILLIAM_FICK@FD.ORG)

### **Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 18, 2014.

*/s/ David I. Bruck*