

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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

**REQUEST FOR JUDICIAL NOTICE OF
SAMs-RELATED LITIGATION IN THIS CASE**

The United States of America, by and through its undersigned counsel, respectfully requests that the Court take judicial notice of the following facts related to the SAMs in this case.

1. The defendant was arraigned on July 10, 2013.
2. On August 27, 2013, the Attorney General of the United States authorized the implementation of Special Administrative Measures (“SAMs”) as to the defendant.
3. On October 2, 2013, the defendant filed a motion to have the SAMs declared unconstitutional and vacated. [Docket # 110]. The government opposed the Motion. [Docket # 127].
4. On November 12, 2013, the Court held a hearing on the Motion. On December 3, 2013, the government filed a Notice advising the court that three modifications had been made to the SAMs.
5. On February 20, 2014, the Defendant filed a Supplemental Memorandum in support of his Motion to Vacate the SAMs, requesting a further modification. The government opposed.
6. On March 12, 2014, the Court held a second hearing on the Motion to Vacate.
7. On April 16, 2014, the Court ordered that the SAMs be modified.
8. On August 7, 2014, the defendant and the government entered into an agreement

that required an additional modification to the SAMs.

9. On May 5, 2014, the Defendant filed a Second Reply requesting another modification to the SAMs.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ William D. Weinreb
WILLIAM D. WEINREB
ALOKE S. CHAKRAVARTY
NADINE PELLEGRINI
Assistant U.S. Attorneys
STEVEN D. MELLIN
Trial Attorney
Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that this document will be served by electronic mail on Dzhokhar Tsarnaev's attorney, Judy Clarke, Esq., on May 10, 2014.

/s/ William Weinreb
WILLIAM D. WEINREB