UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

No. 13-10200-GAO

v.

DZHOKHAR TSARNAEV

MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS TO MOTIONS TO SUPPRESS PHYSICAL EVIDENCE UNDER SEAL

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file certain exhibits to his motions to suppress physical evidence – specifically, FBI reports, search warrant applications, and the search warrants themselves - under seal.

As grounds therefor, undersigned counsel state that the documents are not part of the public record, refer to investigative information, and are covered by the protective order in this case. DE #91.

Respectfully submitted,

DZHOKHAR TSARNAEV by his attorneys

/s/ Miriam Conrad

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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 May 7, 2014.

/s/ Miriam Conrad