

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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

**MOTION FOR LEAVE TO RESPOND TO GOVERNMENT SURREPLY TO  
DEFENDANT’S MOTION FOR CHANGE OF VENUE**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests that the Court grant him leave to file a Response to the Government’s Surreply to Defendant’s Motion for Change of Venue [DE 512].

As grounds for this motion, undersigned counsel states that the Government’s Surreply sets forth arguments and factual assertions that require a response.

Respectfully submitted,

DZHOKHAR TSARNAEV  
By his attorneys

*/s/ Judy Clarke* \_\_\_\_\_

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. (SC Bar # 967)  
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 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 August 29, 2014.

/s/ Judy Clarke