

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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

**MOTION FOR LEAVE TO FILE  
REPLY TO THE GOVERNMENT’S OPPOSITION TO  
THIRD MOTION FOR CHANGE OF VENUE**

Defendant, by and through counsel, respectfully requests leave to file a reply to the government’s Opposition to Defendant’s Third Motion for Change of Venue [DE 992]. As grounds therefor, the government’s opposition cites features of the ongoing voir dire procedure as support of its contention that a change of venue is unwarranted. *See Gov’t Opp.* at 4, 7, 8-9. Defendant requests the opportunity through a reply to similarly cite issues arising after the filing of the defendant’s motion and initial memorandum. Should leave be granted, defendant will file the reply by the close of business tomorrow, January 29, 2015.

Respectfully submitted,

DZHOKHAR TSARNAEV

By his attorneys

/s/ Timothy G. Watkins

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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 January 28, 2015.

/s/ Timothy G. Watkins