

Docket No. 16-6001

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In The United States Court of Appeals  
For The First Circuit

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RECEIVED  
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BY: U.S. COURT OF APPEALS

**UNITED STATES,**

Appellee,

v.

**DZHOKHAR A. TSARNAEV,**

Defendant – Appellant.

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**MOTION TO SEAL MOTION TO DISCLOSE TO APPELLATE COUNSEL  
REPORTS AND RECORDINGS OF INTERVIEWS  
OF IBRAGIM TODASHEV REVIEWED BY  
THE DISTRICT COURT *IN CAMERA* AND *EX PARTE***

Appellant Dzhokhar Tsarnaev, by his counsel, and pursuant to Local R. 11.0(c)(2), hereby moves this Court to seal his Motion To Disclose To Appellate Counsel Reports And Recordings Of Interviews Of Ibragim Todashev Reviewed By The District Court *In Camera* And *Ex Parte* (Motion). Appellant's Motion is based on still-sealed proceedings in the district court. *See* 4/13/15 (Sealed Motion Hearing) Tr. 3-20; 4/17/15 (Sealed Lobby Conference) Tr. 3-4; DE 1326; DE 1342. Therefore, Appellant seeks to file the Motion in this Court under seal. Appellant anticipates that the parties will file a joint motion in the District Court within the next two weeks to unseal these, and other, materials that are currently

under seal. If the District Court were to grant that motion to unseal, then any sealing order as to this Motion would no longer be necessary.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys:

A handwritten signature in black ink, appearing to read 'D. Patton', written over a horizontal line.

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**Certificate of Service**

I certify that on June 29, 2018, I served the foregoing document via FedEx on counsel of record for the government at the following addresses:

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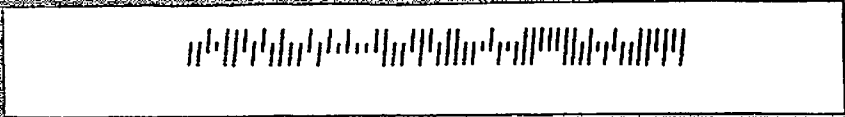
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USMS  
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