

**In:** KSC-BC-2020-06  
**Specialist Prosecutor v. Hashim Thaçi, Kadri Veseli, Rexhep Selimi and Jakup Krasniqi**

**Before:** Trial Panel II  
Judge Charles L. Smith III, Presiding  
Judge Christoph Barthe  
Judge Guénaël Mettraux  
Judge Fergal Gaynor, Reserve Judge

**Registrar:** Dr. Fidelma Donlon

**Filing Participant:** Specialist Counsel for Hashim Thaçi  
Specialist Counsel for Kadri Veseli  
Specialist Counsel for Rexhep Selimi  
Specialist Counsel for Jakup Krasniqi

**Date:** 8 April 2024

**Language:** English

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**Public Redacted Version of**

**Joint Defence Consolidated Response to F02195 and F02196 with confidential**

**Annexes 1-12**

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## I. INTRODUCTION

1. The Defence for Messrs. Hashim Thaçi, Kadri Veseli, Rexhep Selimi, and Jakup Krasniqi (“Defence”) hereby files its consolidated response to the Prosecution Submission of List of Witnesses for 22 April to 18 July 2024<sup>1</sup> and the Prosecution Motion for Admission of Evidence of Witnesses W01978, W02540, W02677, W02714, W02951, W03865, W03881, W04371, W04710, and W04850 pursuant to Rule 154 and Related Requests.<sup>2</sup>

2. The present filing responds to the Rule 154 Motion with respect to the following witnesses: W01978, W02540, W02677, W02714, W02951, W03865, W03881, W04371, W04710, and W04850. The Annexes contain objections to documents the SPO intends to use with these witnesses, as well as with W03877 and W04744, and Defence estimates for cross-examination.<sup>3</sup>

3. This filing is submitted confidentially because it responds to documents with the same classification.<sup>4</sup>

## II. PROCEDURAL HISTORY

4. On 22 March 2024, the Specialist Prosecutor’s Office filed the List of Witnesses for the period of 22 April to 18 July 2024 and the Motion.

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<sup>1</sup> KSC-BC-2020-06, F02195, Specialist Prosecutor, *Prosecution Submission of List of Witnesses for 22 April to 18 July 2024* (“List of Witnesses”), 22 March 2024, public, with Annexes 1-2, confidential.

<sup>2</sup> KSC-BC-2020-06, F02196, Specialist Prosecutor, *Prosecution Motion for Admission of Evidence of Witnesses W01978, W02540, W02677, W02714, W02951, W03865, W03881, W04371, W04710, and W04850 pursuant to Rule 154 and Related Requests* (“Motion”), 22 March 2024, confidential, with Annexes 1-10, confidential.

<sup>3</sup> See *infra*, paras 6-7.

<sup>4</sup> Rule 82(4) of the Rules of Procedure and Evidence on the Kosovo Specialist Chambers (“Rules”).

5. On 27 March 2024, the SPO filed a Further Rule 154 Motion.<sup>5</sup>

6. On 28 March 2024, the Defence gave notice to the SPO via *inter partes* correspondence of its intention to request an extension of time until 8 April 2024 to respond to the first 10 witnesses in the List of Witnesses and to the Motion; and until 26 April to respond to the remaining witnesses and the Further Rule 154 Motion.<sup>6</sup> The SPO responded that it did not oppose the Defence request.<sup>7</sup> Counsel for Rexhep Selimi, on behalf of the Defence, made an oral application for an extension of time before the Panel.<sup>8</sup>

7. On the same day, the Panel granted the Defence request.<sup>9</sup> The Panel extended the limit to respond, by 8 April, to the first 10 witnesses in the List of Witnesses and to the Motion; and by 29 April,<sup>10</sup> to the remaining witnesses in the List of Witnesses, and to the Further Rule 154 Motion. The Defence notes, however, that while W02540 and W03881 are not included among the first 10 witnesses, both witnesses are part of the Motion. For the sake of convenience, the Defence's time estimates and comments to the documents of both witnesses are submitted with the present response.<sup>11</sup>

### III. SUBMISSIONS

8. At the outset, the Defence notes that the SPO seeks admission of material pursuant to Rule 154 in relation to a number of witness for which the additional time

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<sup>5</sup> KSC-BC-2020-06, F02204, Specialist Prosecutor, *Prosecution Motion for Admission of Evidence of Witnesses W01511, W04260, W04305, W04410, W04744, W04752, and W04764 pursuant to Rule 154* ("Further Rule 154 Motion"), 27 March 2024, confidential, with Annexes 1-8, confidential.

<sup>6</sup> Thaçi Defence e-mails from 28 March 2024 at 11:39 and 12:19.

<sup>7</sup> SPO e-mail from 28 March 2024 at 12:44.

<sup>8</sup> KSC-BC-2020-06, Transcript of Hearing, 28 March 2024, confidential, p. 14092, lines 7-25.

<sup>9</sup> KSC-BC-2020-06, F02209, Trial Panel II, *Decision on Selimi Defence Request for Extension of Time to Respond to F02195, F02196, and F02204* ("Trial Panel Decision"), 28 March 2024, public, paras 4-5.

<sup>10</sup> 26 April 2024 is an official holiday. See Trial Panel Decision, para. 2.

<sup>11</sup> See Annexes 2, 7.

required for direct examination appears to be excessively long.<sup>12</sup> As submitted below, the practice of admitting witness' material pursuant to Rule 154 where the time-saving benefit is minimal or non-existing, undermines the very purpose of Rule 154, which is to save time and resources.<sup>13</sup> It further contributes to bloating the case record, due to the inevitable repetition in court of the same evidence that is admitted pursuant to Rule 154. In this regard, and echoing the SPO's concerns about "bloating the record even more",<sup>14</sup> the Defence invites the SPO to reconsider calling witnesses *viva voce* when the time required for direct examination would not significantly increase the estimated time for additional examination. Alternatively, the SPO should be ordered to reduce the time for direct examination of these witnesses.

#### A. W01978

9. The Defence does not object to the admission of W01978's proposed evidence via Rule 154. However, the current estimate of two hours for its in-court examination of the witness appears excessive.<sup>15</sup> The Defence observes that the SPO seeks to introduce three separate statements regarding his time in detention - including a 150-page verbatim SPO transcript - and fails to explain why it seeks two hours of court time to adduce further evidence from the witness. Given the volume of material tendered via Rule 154, the SPO should be ordered to further reduce its estimated time for direct examination.

10. The Defence does not oppose the addition of SITF00014555-00014563 to the list of exhibits.<sup>16</sup>

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<sup>12</sup> See *infra*, paras 9, 13, 19, 22-24, 30.

<sup>13</sup> KSC-BC-2020-06, F01380, Trial Panel II, *Decision on Admission of Evidence of First Twelve SPO Witnesses Pursuant to Rule 154* ("First Rule 154 Decision"), 16 March 2023, confidential, para. 20.

<sup>14</sup> KSC-BC-2020-06, Transcript of Hearing, 26 March 2024, confidential, p. 13713, line 20.

<sup>15</sup> Motion, para. 10.

<sup>16</sup> *Idem*, paras 11-12.

## B. W02540

11. W02450 is intended to provide evidence, *inter alia*, on the alleged occupation by the KLA of the MUP building in Prizren, [REDACTED] according to W02450's evidence and [REDACTED].<sup>17</sup>

12. The Defence does not object to the W02540 proposed statements provided by the witness, recognising that they meet the basic indicia for authenticity. Further, the Defence does not oppose the admission of the material tendered for admission as associated exhibits.<sup>18</sup>

13. Nevertheless, W02540 proposed statements contain 137 pages of evidence, the associated exhibits tendered by the SPO into admission via Rule 154 contain a 6 minute length video and around 20 pages of exhibits in total which is incompatible with the SPO seeking to elicit two hours of evidence during its examination-in-chief. Such a lengthy examination-in-chief in addition to the W02540's preparation session where the SPO will also have an opportunity to clarify or explain certain aspects of W02540's evidence would jeopardise time-saving purpose of Rule 154 admission.

14. However, the Defence objects to the SPO's request to amend the exhibit list to include an official note of a recent contact with W02540 and three photographs.<sup>19</sup> The SPO provides that the official note "memorialises a conversation between the SPO and W02540 on 30 January 2024 and describes and appends a photograph provided by

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<sup>17</sup> Motion, paras 14-16; 069539-TR-ET Part 1 Revised 1 RED; 069539-TR-ET Parts 2-4 Revised 1; 069539-TR-AT Part 1 Revised RED; 069539-TR-AT Parts 2-4 Revised; 069539-TR Part 1 Revised RED; 069539-TR Parts 2-4 Revised; [REDACTED]

<sup>18</sup> [REDACTED]; 054010-03 (14:00:00-14:05:55:01); 5005597-5005597; 5005597-5005597-ET; SITF00031163-SITF0003167, pp. SITF00031164-SITF00031165; SITF00188892-00188901 RED2; SITF00188892-SITF00188901-ET RED2; SITF00188892-SITF00188901-AT RED2.

<sup>19</sup> Motion, para. 21, including fn. 25 (19101-119105 RED; [REDACTED]).

W02540, which was previously referred to by him in his SPO interview".<sup>20</sup> The SPO interviewed W02540 on [REDACTED], since that time the SPO has had sufficient time prior to the submission of its initial exhibit list on 17 December 2021<sup>21</sup> and/or until the beginning of the trial in April 2022. Therefore, the Defence considers such request to amend the exhibit list late and objects to the addition of the photograph obtained from W02540 and to the SPO's note of contact describing this photograph.<sup>22</sup>

15. Similarly, the Defence objects to the SPO's request to amend the exhibit list with additional two photos provided by the witness to the ICTY on [REDACTED].<sup>23</sup> The SPO has already been in a possession of these photographs; in addition, they were previously disclosed under Rule 102(3) to all the Defence Teams apart from the Thaçi Defence Team.<sup>24</sup> However, the two photographs have only been disclosed to the Thaçi Defence following the Motion, which was submitted on 22 March 2024.<sup>25</sup>

16. It is both untimely and prejudicial to the Defence to request amendment of the exhibit list simultaneously with disclosing one of such items to the Thaçi Defence Team only at this stage and right prior to W02450's testimony. The Defence objects to such late amendment of the exhibit list and to the use of such items by the SPO with W02540 during his testimony in court.<sup>26</sup>

### C. W02677

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<sup>20</sup> *Idem*, para. 22, including fn. 26.

<sup>21</sup> KSC-BC-2020-06, F00631/RED, Specialist Prosecutor, *Public Redacted Version of 'Submission of Pre-Trial Brief, with Witness and Exhibit Lists'*, KSC-BC-2020-06/F00631, dated 17 December 2021, 21 December 2021, public, with Annexes 1-3, confidential.

<sup>22</sup> 19101-119105 RED.

<sup>23</sup> [REDACTED].

<sup>24</sup> Motion, para. 23, including fn. 27.

<sup>25</sup> *Ibid.*

<sup>26</sup> Motion, paras 21-25.

17. The Defence does not object to the admission, through Rule 154, of W02677's SPO interview.<sup>27</sup>

#### D. W02714

18. The SPO seeks admission of two interviews: an SITF interview taking place in [REDACTED];<sup>28</sup> and an interview with the Serbian MUP in [REDACTED].<sup>29</sup> W02714 has no associated exhibits.

19. The Defence submits that there would be no time-saving benefit to admitting W02714's proposed evidence in writing.<sup>30</sup> The SPO still intends to use around 1.5 hours of time for direct examination, focused on precisely the same topics covered in W02714's prior statements.<sup>31</sup> The SPO direct examination is thus likely to be repetitive and the purpose of Rule 154 would be undermined.

20. The combined dossier for W02714 amounts to 40 pages in length and there are no associated exhibits. W02714 is also quoted extensively in the SPO's Pre-Trial Brief, as he is the sole SPO witness to speak to detentions in [REDACTED].<sup>32</sup> For these reasons, the Defence suggests that W02714 should provide his testimony *viva voce*.

#### E. W02951

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<sup>27</sup> 076247-TR-ET Parts 1-2 RED; 076247-TR-AT Parts 1-2 RED; 076247-TR-ST Parts 1-2 RED.

<sup>28</sup> 025450-TR-ET Part 1 RED2; 025450-TR-ET Part 2; 025450-TR-AT Part 1 RED2; 025450-TR-AT Part 2; 025450-TR Part 1 RED; 025450-TR Part 2.

<sup>29</sup> 025447-025449-ET RED2; 025447-025449-AT RED2; 025443-025450 RED, pp. 5-7.

<sup>30</sup> First Rule 154 Decision, para. 20.

<sup>31</sup> Motion, para. 38.

<sup>32</sup> [REDACTED].

21. The SPO seeks admission of a four-part SPO interview with W02951 and one associated exhibit.<sup>33</sup> Whilst the Defence does not contest the *prima facie* authenticity and reliability of W02951's SPO interview,<sup>34</sup> it opposes the suitability of W02951's proposed evidence for Rule 154 admission.<sup>35</sup>

22. Contrary to the SPO submissions,<sup>36</sup> the time-saving benefit of admitting W02951's proposed evidence in writing would be extremely limited.<sup>37</sup> The SPO anticipates approximately one hour of direct examination.<sup>38</sup> The SPO interview is 94 pages long, at times repetitive,<sup>39</sup> and parts of it have little to no relevance to the charges in the present case.<sup>40</sup> These 94 pages includes the introductory part of the interview as well, which is about 10% of the 94 pages.

23. Further, the exact topics that the SPO intends to cover in direct examination<sup>41</sup> are addressed in detail in W02951's SPO interview, [REDACTED];<sup>42</sup> his [REDACTED];<sup>43</sup> [REDACTED];<sup>44</sup> the [REDACTED];<sup>45</sup> and [REDACTED].<sup>46</sup> The SPO will have ample opportunity to highlight, clarify, or explain certain aspects of his evidence during the witness' preparation session.<sup>47</sup>

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<sup>33</sup> 041337-TR-AT Parts 1-4 Revised-ET RED; 041337-TR-AT Parts 1-4 Revised RED3; 041336-041336-ET; 041336-041336.

<sup>34</sup> Motion, para. 42.

<sup>35</sup> *Idem*, para. 44.

<sup>36</sup> *Ibid.*

<sup>37</sup> First Rule 154 Decision, para. 20.

<sup>38</sup> Motion, para. 44.

<sup>39</sup> *E.g.*, 041337-TR-AT Part 1 Revised-ET RED, pp. 10-11; 041337-TR-AT Part 4 Revised-ET RED, pp. 7-8; 041337-TR-AT Part 2 Revised-ET RED, pp. 3-4; 041337-TR-AT Part 3 Revised-ET RED, p. 17; 041337-TR-AT Part 2 Revised-ET RED, p. 7; 041337-TR-AT Part 3 Revised-ET RED, pp. 1-2.

<sup>40</sup> *See e.g.*, 041337-TR-AT Part 4 Revised-ET, pp. 13-15.

<sup>41</sup> KSC-BC-2020-06, F02195/A01, Specialist Prosecutor, *Annex 1 to Prosecution Submission of List of Witnesses for 22 April to 18 July 2024*, 22 March 2024, confidential, p. 9.

<sup>42</sup> 041337-TR-AT Part 4 Revised-ET RED.

<sup>43</sup> 041337-TR-AT Parts 1-3 Revised-ET RED.

<sup>44</sup> 041337-TR- AT Part 3 Revised-ET RED.

<sup>45</sup> *Ibid.*

<sup>46</sup> 041337-TR- AT Part 3 Revised-ET RED; 041337-TR-AT Part 4 Revised-ET RED.

<sup>47</sup> Motion, para. 44.



24. An additional hour of direct examination will thus inevitably result in questioning the witness on issues already contained in the Rule 154 statement, defeating the primary purpose of Rule 154, which is to save time and resources.<sup>48</sup> In any event, and given the nature and the scope of W02951's expected testimony, hearing the entirety of the witness' testimony *viva voce* would not significantly affect the time required for examination-in-chief and would further provide necessary clarity for the evidentiary record.

25. The SPO seeks admission of a handwritten note discussed with W02951 during the SPO interview.<sup>49</sup> The Defence opposes the admission of the handwritten note.

26. The document does not bear the sufficient indicia of authenticity and reliability and has no probative value. First, the document has no indication of authorship. It is not signed, W02951 is not the author of the document, he can only identify the person who wrote it by [REDACTED], and is unable to provide any further details.<sup>50</sup> Second, despite W02951's [REDACTED],<sup>51</sup> the note is undated. Third, the note is mostly illegible, with only a few words being partially visible. Fourth, whilst the document appears to have references [REDACTED].<sup>52</sup> As such, the document has minimal, if any, probative value.

#### F. W03865

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<sup>48</sup> First Rule 154 Decision, para. 32.

<sup>49</sup> Motion, para. 43.

<sup>50</sup> 041337-TR-AT Part 4 Revised-ET RED, p. 23.

<sup>51</sup> 041337-TR-AT Part 3 Revised-ET RED, p. 6.

<sup>52</sup> 041337-TR-AT Part 4 Revised-ET RED, p. 23.

27. The Defence does not object to the admission, through Rule 154, of W03865's UNMIK and SPO interviews.<sup>53</sup>

28. The Defence objects to the admission of [REDACTED], U000-6628-U000-6639-ET, as associated exhibit and proposed exhibit. W03865 said he [REDACTED].<sup>54</sup> Therefore he could not authenticate the document. Pursuant to an SPO email [REDACTED]; therefore, there is no clear chain of custody for this document and its author, its purpose and the circumstances/date of its elaboration are unknown, which prevents its admission as exhibit through W03865.

29. The Defence further objects to the admission of [REDACTED], SPOE00322107-00322152, as associated exhibit and proposed exhibit. W03865 [REDACTED].<sup>55</sup> The document is undated and the witness could not clarify to which period it referred.<sup>56</sup> Therefore he could not authenticate the document, which prevents its admission through him.

#### G. W03881

30. The Defence does not object to the admission of W03881's proposed evidence via Rule 154.<sup>57</sup> However, the SPO interview consists of over 200 pages. Given its volume and the limited relevance of this witness's evidence to the charges in the indictment, the Defence suggests that the SPO be ordered to further reduce its estimated time for direct examination, which currently stands at 'approximately 1.5 hours'.<sup>58</sup>

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<sup>53</sup> SITF00032808-SITF00032820 RED, pp. SITF00032808-SITF00032810; SITF00032808-SITF00032820 RED, pp. SITF00032816-SITF00032820; 078562-TR-ET Parts 1-4 RED; 078562-TR-AT Parts 1-4 RED.

<sup>54</sup> 078562-TR-ET Part 2 RED, pp. 11-13.

<sup>55</sup> See 078562-TR-ET Part 2 RED, pp. 17-19.

<sup>56</sup> 078562-TR-ET Part 2 RED, pp. 17-19.

<sup>57</sup> 071136-TR-ET Parts 1, 3 Revised 1 RED; 071136-TR-ET Parts 2, 4-5 Revised 1; 071136-TR-AT Part 1 Revised RED; 071136-TR-AT Parts 2-5 Revised; 071136-TR Parts 1, 3 Revised RED; 071136-TR Parts 2, 4-5 Revised.

<sup>58</sup> Motion, para. 58.

31. The Defence does not object to the admission of the associated exhibits, with the exception of W03881's [REDACTED], 071139-071313, which the SPO submits should be admitted in its entirety.<sup>59</sup> The diary consists of 176 pages, many of which are not relevant to the charges in the indictment. In light of the ever-present concern for the size of the record in this case, the Defence submits it would be more appropriate to admit only the excerpts of the diary discussed by W03881 during his SPO interview.

#### H. W04371

32. W04371 is intended to provide evidence on the alleged arrest, detention and disappearance of [REDACTED].<sup>60</sup> The Defence does not object to the statement provided by the witness to the SPO on [REDACTED],<sup>61</sup> recognising that it meets the basic indicia for relevance and authenticity.

33. However, the Defence submits that the UNMIK statement [REDACTED]<sup>62</sup> does not meet the minimum requirements of authenticity to be admitted pursuant to Rule 154. First, the document is unsigned; the only visible signature is that of [REDACTED].<sup>63</sup> Second, the interview was not conducted in person, but on the phone.<sup>64</sup> How this phone call was conducted, and what safeguards, if any, were employed to ensure the accuracy of the statement, remains unclear. The only information in this regard recites that [REDACTED],<sup>65</sup> which provides no clarity whatsoever. Moreover, there is no indication that the statement was read back to the witness; it follows that W04371 had no chance to review and, if needed, make

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<sup>59</sup> *Idem*, para. 57.

<sup>60</sup> Motion, para. 59.

<sup>61</sup> 060207-TR-ET Parts 1-7 Revised RED2.

<sup>62</sup> SITF00299810-SITF00299818 RED2.

<sup>63</sup> *Idem*, p. SITF00299812.

<sup>64</sup> *Idem*, p. SITF00299810.

<sup>65</sup> *Ibid*.

corrections to the statement. When asked about it in his SPO interview, the witness vaguely remembered the phone call but was unable to elaborate on the circumstances of this phone call.<sup>66</sup>

34. Third, while the document asserts that the phone call started at 11:20 and ended at 12:10,<sup>67</sup> it only records four questions and answers, which appears to suggest that the record is incomplete. Fourth, while the document appears to contain a witness warning, the boxes confirming that the witness understands his rights and wishes to give up his right to silence and talk to the investigator, are left blank. The box requiring the witness' signature to certify the understanding of his rights is also left blank.<sup>68</sup> When read together, all the above shortcomings demonstrate that W04371's UNMIK statements falls short of the minimum requirements for admission pursuant to Rule 154.

35. The Defence does not object to the admission of the associated exhibits.<sup>69</sup>

#### I. W04710

36. The Defence does not object to the admission, through Rule 154, of W04710's SPO interview<sup>70</sup> and its associated exhibit 100829-100829-ET.

#### J. W04850

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<sup>66</sup> 060207-TR-ET Part 1 Revised RED2, pp. 7-8.

<sup>67</sup> SITF00299810-SITF00299818 RED2, pp. SITF00299810, SITF00299812.

<sup>68</sup> SITF00299810-SITF00299818 RED2, p. SITF00299810.

<sup>69</sup> SITF00299805-SITF00299809-ET; SITF00299805-SITF00299809; 060178-060189 RED2, p. 060184; 060178-060189 RED2, p. 060185; 060178-060189 RED2, p. 060187; 060178-060189 RED2, pp. 060188-060189; SPOE00301664-SPOE00301673, pp. SPOE00301664-SPOE00301665; 045015-045016-AT RED2; 060200-060206; U008-2532-U008-2532-ET; 060178-060189 RED2, p. 060186; SPOE00208402-00208421; SPOE00208402-SPOE00208421-AT; U001-7995-U001-7995-ET; 083505-083505.

<sup>70</sup> 091696-TR-ET Parts 1-3 RED2; 091696-TR-AT Parts 1-3 RED2.

37. The Defence does not contest the *prima facie* authenticity and reliability of his proposed statements.<sup>71</sup>

38. This notwithstanding, the Defence note and reiterate concerns expressed in the Rule 153 Response.<sup>72</sup> In particular, that W04850 does not possess any first-hand knowledge about what happened to [REDACTED] after two soldiers allegedly took him with them and that for the most part of his further evidence W04850 relies on the information which he heard from [REDACTED] or from what the [REDACTED].<sup>73</sup> In addition, W04850 further relies on the information regarding the detention of [REDACTED] which he received from [REDACTED] whose name W04850 could not remember and whose words W04850 considered [REDACTED].<sup>74</sup> Thus, the Defence invite the Panel to exercise necessary caution when assessing this witness's evidence if admitted via Rule 154.

#### IV. CONCLUSION

39. For the reasons set out above, the Defence respectfully requests the Trial Panel to take notice of the Defence objections, and to:

- DENY the admission of W02714 and W02951's evidence through Rule 154 and ORDER the SPO to elicit their evidence *viva voce*;
- DENY the admission of one statement relating to W04371, namely, SITF00299810-SITF00299818 RED2;

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<sup>71</sup> SPOE00089545- 00089570 RED and SPOE00092352- 00092379 RED, pp. SPOE00092355- 0092379 RED.

<sup>72</sup> KSC-BC-2020-06, F02063, Defence Counsel, *Joint Defence Response to Prosecution Motion for the Admission of the Evidence of Witnesses W04016, W04019, W04044, W04305, W04361, W04722, W04816, W04850, W04851, and W04852 pursuant to Rule 153 (F01994)* ("Rule 153 Response"), 15 January 2024, confidential, para. 49.

<sup>73</sup> SPOE00089545-00089570 RED, pp. SPOE00089547-SPOE00089549.

<sup>74</sup> *Idem*, p. SPOE00089558-SPOE00089559.

- DENY the admission of 041336-041336/041336-041336-ET; U000-6628-U000-6639/U000-6628-U000-6639-ET; SPOE00322107-00322152; and all pages of 071139-071313 as associated exhibits; and
- DENY the SPO request to add 119101-119105 RED; and [REDACTED] to the list of exhibits.

**Word count: 3,581**

Respectfully submitted on 8 April 2024



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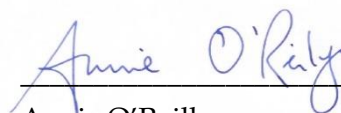
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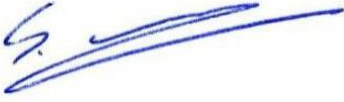
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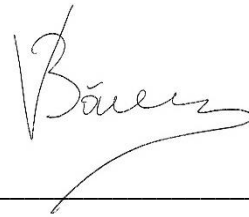
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