

**In:** KSC-BC-2023-10  
**The Specialist Prosecutor v. Sabit Januzi, Ismet Bahtijari and Haxhi Shala**

**Before:** **Trial Panel I**  
Judge Mappie Veldt-Foglia, Presiding Judge  
Judge Roland Dekkers  
Judge Gilbert Bitti  
Judge Vladimir Mikula, Reserve Judge

**Registrar:** Dr Fidelma Donlon

**Filing Participant:** **Specialist Counsel for Ismet Bahtijari**

**Date:** 20 November 2024

**Language:** English

**Classification:** Public

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**(publicly redacted version) BAHTIJARI response to F00603 and reply to F00606 and F00608**

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**Specialist Prosecutor's Office**

Kimberley P. West

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Jonathan Rees KC

Huw Bowden

**Counsel for Ismet Bahtija**

Felicity Gerry KC

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## **I. INTRODUCTION**

1. Pursuant to Rule 82 and, more precisely, Rule 82(3) of the Rules of Procedure and Evidence ('the Rules'), this filing is to clarify the amount of time the defence for Mr Bahtijari seeks [REDACTED]

## **II. PROCEDURAL HISTORY**

2. Mr Bahtijari has [REDACTED]
3. On 14 November 2024, the Defence for Mr Bahtijari ('the Defence') have requested [REDACTED]
4. On 15 November 2024, the Specialist Prosecutor's Office ('the SPO') [REDACTED]
5. On 18 November 2024, the Panel issued [REDACTED]
6. On 18 November 2024, the Defence for Mr Januzi [REDACTED]
7. On 19 November 2024, The Defence for Mr Shala [REDACTED]

## **III. APPLICABLE LAW**

8. Pursuant to Rule 82(3) of the Rules:

'Any filing classified as confidential or strictly confidential shall state the reasons for such classification, and whether and when it may be reclassified. Unless and until otherwise ordered by a Panel, the filing shall be treated according to that classification.'

#### IV. SUBMISSIONS

9. The Defence hereby submits that the Shala team are correct and [REDACTED]

10. At the outset, the Defence submits that [REDACTED]

11. The Defence aim to have all [REDACTED]

12. Accordingly, it is requested that [REDACTED]

13. The Panel will recall that [REDACTED]

14. It is submitted that [REDACTED]

15. On reflection, it is submitted that [REDACTED]

16. At this stage, [REDACTED]

#### V. CONCLUSION

17. For all the above reasons, it is submitted that [REDACTED]

#### VI. CLASSIFICATION

18. This document is filed as confidential at this stage. A publicly redacted version will be prepared.

**Word count: 861**

A handwritten signature in black ink, appearing to read 'Felicity Gerry', with a long, sweeping underline that extends to the left and then curves back to the right.

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**Dr Felicity Gerry KC**

**Counsel for Mr Bahtijari**

20 November 2024

At Dar es Salaam, Tanzania