

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: 15 November 2024

Language: English

Classification: Public

(publicly redacted version) BAHTIJARI application for [REDACTED]

Specialist Prosecutor's Office

Kimberley P. West

Counsel for Sabit Januzi

Jonathan Rees KC

Huw Bowden

Counsel for Ismet Bahtija

Felicity Gerry KC

Marion Carrin

Counsel for Haxhi Shala

Toby Cadman

John Cubbon

I. INTRODUCTION

1. Pursuant to Rule 75(1) of the Rules of Procedure and Evidence ('the Rules'), the Defence for Ismet Bahtijari ('the Defence') hereby requests [REDACTED]

II. PROCEDURAL HISTORY

2. The Trial Chamber has [REDACTED]

III. APPLICABLE LAW

4. These submissions are filed under Rule 75 of the *Rules*.
5. Pursuant to [REDACTED]
6. [REDACTED]
7. Finally, pursuant to [REDACTED]

IV. SUBMISSIONS

8. The Defence hereby submits that[REDACTED]
9. Mr Bahtijari has [REDACTED]
10. [REDACTED]
11. Mr Bahtijari has [REDACTED]

12. [REDACTED]

13. The Defence will [REDACTED]

14. It is noted that [REDACTED]

15. For the fore going reasons, the Defence hereby respectfully requests the Panel [REDACTED].

V. CONCLUSION

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

VI. CLASSIFICATION

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

Word count: 534

A handwritten signature in black ink, appearing to read 'Felicity Gerry', with a long horizontal flourish extending to the right.

Dr Felicity Gerry KC

Counsel for Mr Bahtijari

15 November 2024

At The Hague, The Netherlands