

In: KSC-BC-2020-06
The 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 Guénaél Mettraux
Judge Fergal Gaynor, Reserve Judge

Registrar: Dr Fidelma Donlon

Filing Participant: Specialist Counsel for Hashim Thaçi

Date: 14 February 2025

Language: English

Classification: Public

**Public Redacted Version of 'Urgent Thaçi Defence Request for Temporary Release
on Compassionate Grounds
with Confidential *Ex Parte* Annexes 1 – 2'**

Specialist Prosecutor's Office

Kimberly P. West

Counsel for Hashim Thaçi

Luka Misetic

Counsel for Kadri Veseli

Rodney Dixon KC

Counsel for Victims

Simon Laws

Counsel for Rexhep Selimi

Geoffrey Roberts

Counsel for Jakup Krasniqi

Venkateswari Alagendra

I. INTRODUCTION

1. On [REDACTED] February 2025, Mr Hashim Thaçi's father, Mr Haxhi Thaçi, was admitted to hospital in Kosovo "in a grave clinical state".¹ His symptoms included [REDACTED].² On [REDACTED] February, he was diagnosed with [REDACTED] and his doctor noted that during his hospital stay, there was "only slight improvement in clinical state despite regular therapy."³ He recommended that the patient "continue with intensive treatment", but concluded that he had a "poor long term prognosis".⁴ During this hospital stay, Mr Haxhi Thaçi was treated by [REDACTED].⁵

2. Mr Haxhi Thaçi was discharged from hospital on [REDACTED] February 2025 with an updated diagnostic including: [REDACTED].⁶ His treating doctor observed that "due to the patient's critically serious overall condition, with multiple systemic health issues, the patient's condition may deteriorate at any time, has to be monitored continuously and should be transferred to the Emergency Clinic- [REDACTED] if his condition worsens."⁷

3. This was the third time that Mr Haxhi Thaçi had been hospitalised in the past month.⁸ He was hospitalised between [REDACTED] January 2025, with "severe

¹ Annex 1, Medical Report of Mr Haxhi Thaçi dated [REDACTED] February 2025 ("[REDACTED] February 2025 Medical Report").

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ Annex 2, Specialist Report of Mr Haxhi Thaçi dated [REDACTED] February 2025 ("[REDACTED] February 2025 Specialist Report").

⁶ *Ibid.*

⁷ *Ibid.*

⁸ KSC-BC-2020-06/F02870, Urgent Thaçi Defence Request for Temporary Release on Compassionate Grounds with Confidential *Ex Parte* Annex 1, Confidential and *ex parte*, 28 January 2025 ("Third Request"), paras 1-2. See also its Annex 1, KSC-BC-2020-06/F02870/A01, Medical Reports for Mr Haxhi Thaçi ("January 2025 Medical Reports").

general complaints”,⁹ including [REDACTED]. He was diagnosed with [REDACTED],¹⁰ and [REDACTED].¹¹ After having been discharged on [REDACTED] January 2025,¹² Mr Haxhi Thaçi was readmitted through the Emergency Department on [REDACTED] January 2025 “due to the worsening of his health condition”.¹³ Upon his second discharge after he stabilised, his treating doctor noted that “[d]ue to the deteriorating health condition, the patient should be hospitalized at any time if there is no improvement in his condition.”¹⁴

4. Mr Haxhi Thaçi’s health condition now has worsened. He has experienced a [REDACTED], which warranted his hospitalisation again between [REDACTED] February 2025, having been diagnosed with an overall “poor long term prognosis”.¹⁵ The Defence accordingly requests that the Trial Panel order the immediate temporary custodial release of Mr Thaçi for a period of one (1) day to allow him to visit his father. The visit would be limited to [REDACTED], in presence of his father, his mother, [REDACTED], his father’s carer, [REDACTED], as well as his wife [REDACTED].

5. The present request is brought before Trial Panel II, on the understanding that the same request will also need to be subsequently filed in front of the Pre-Trial Judge in KSC-BC-2023-12.

II. PROCEDURAL AND FACTUAL BACKGROUND

6. On 5 November 2020, following the confirmation of an indictment and the issuance of an arrest warrant,¹⁶ Mr Thaçi voluntarily resigned from the Office of

⁹ January 2025 Medical Reports, p. 6.

¹⁰ January 2025 Medical Reports, pp. 6, 8.

¹¹ January 2025 Medical Reports, p. 6.

¹² January 2025 Medical Reports, p. 8.

¹³ January 2025 Medical Reports, p. 6.

¹⁴ January 2025 Medical Reports, p. 6.

¹⁵ *Ibid.*

¹⁶ KSC-BC-2020-06/F00027/A01/RED, *Public Redacted Version of Arrest Warrant for Hashim Thaçi*, 5 November 2020.

President and surrendered to KSC custody.¹⁷ He has been in detention ever since.

7. Mr Thaçi's continued detention has been reviewed on eighteen occasions. In the most recent review of detention, the Trial Panel found Mr Thaçi's continued detention was necessary "in order to avert the risks in Article 41(6)(b)(ii) and (iii)",¹⁸ but considered that detention was "not justified at this time based on the risk of flight pursuant to Article 41(6)(b)(i)."¹⁹ The Trial Panel "has credited Mr Thaçi with cooperation because when he was informed of his arrest warrant, he resigned from the position of President of Kosovo and subjected himself voluntarily to the jurisdiction of the SC."²⁰

8. On 23 May 2023, the Defence filed an urgent request for the temporary release of Mr Thaçi on compassionate grounds, on the basis of his mother's critical medical condition.²¹ At that time, the SPO did not oppose the request, subject to the imposition of specific conditions.²² The Registrar also confirmed the feasibility of the visit, and proposed conditions including that the visit be limited to one day, Mr Thaçi's interactions be limited to his mother and father, and a condition of secrecy.²³ This request was granted by the Trial Panel on 25 May 2023, authorising Mr Thaçi's

¹⁷ KSC-BC-2020-06/F00065/RED, Registrar, *Public Redacted Version of 'Report on the Arrest and Transfer of Hashim Thaçi to the Detention Facilities'*, filing F00065 dated 8 November 2020, 18 November 2020.

¹⁸ KSC-BC-2020-06/F02926, Trial Panel II, *Decision on Periodic Review of Detention of Hashim Thaçi*, 13 February 2025, public, para. 33.

¹⁹ *Ibid.*, para. 17.

²⁰ *Ibid.*, para. 16.

²¹ KSC-BC-2020-06/F01547, *Urgent Thaçi Defence Request for Temporary Release on Compassionate Grounds*, 23 May 2023, confidential and *ex parte* (a public redacted version was filed on 5 June 2023).

²² KSC-BC-2020-06/F01550, *Prosecution response to urgent Thaçi request for temporary release*, 24 May 2023, confidential and *ex parte*, para. 1 (a public redacted version was filed on 1 June 2023).

²³ KSC-BC-2020-06/F01551, *Registrar's Submissions on Thaçi Defence Request for Temporary Release on Compassionate Grounds*, 24 May 2023, confidential and *ex parte*, paras. 13, 19-22 (a public redacted version was filed on 5 June 2023).

temporary and secure transfer to Kosovo for one day to visit his mother at his parents' home, subject to further specified conditions.²⁴

9. The secure and temporary transfer of Mr Thaçi to Kosovo to visit his mother took place on 29 May 2023, and all of the stipulated conditions were fulfilled. The Registrar noted that "Mr Thaçi abided by the instructions of the chief custody officer and the escorting officers during the custodial visit."²⁵

10. On 30 August 2023, the Defence filed a second request for the temporary release of Mr Thaçi on compassionate grounds, due to the critical medical condition of his father, then diagnosed with [REDACTED].²⁶ The SPO did not oppose a strictly supervised, fully custodial visit for one day.²⁷ The Registrar also confirmed the feasibility of the requested visit, and proposed conditions including that the visit be limited to one day, Mr Thaçi's interactions be limited to his mother and father, and two immediate family members at a time, and a condition of secrecy.²⁸ This request was granted by the Trial Panel on 1 September 2023, authorising Mr Thaçi's temporary and secure transfer to Kosovo for one day to visit his mother and father at his parents'

²⁴ KSC-BC-2020-06/F01556/COR, Trial Panel II, *Corrected Version of Decision on Urgent Thaçi Request for Temporary Release on Compassionate Grounds*, 26 May 2023, confidential and *ex parte* ("Thaçi First Decision"), para. 30 (a public redacted version was filed on 21 June 2023).

²⁵ KSC-BC-2020-06/F01591, *Report of the Registrar Pursuant to Decision on Urgent Thaçi Request for Temporary Release on Compassionate Grounds*, Confidential and *ex parte*, 8 June 2023, para. 18 (a public redacted version was filed on 30 June 2023) ("First Registrar's Report").

²⁶ KSC-BC-2020-06/F01749, *URGENT Thaçi Defence Second Request for Temporary Release on Compassionate Grounds With Confidential Ex Parte Annex 1*, 30 August 2023, confidential and *ex parte* ("Thaçi Second Request"), para. 1 (a public redacted version was filed on 7 September 2023).

²⁷ KSC-BC-2020-06/F01751, *Prosecution Response to Urgent Thaçi Defence Second Request for Temporary Release*, 30 August 2023, confidential and *ex parte*, para. 1 (reclassified as public on 18 September 2023).

²⁸ KSC-BC-2020-06/F01752, *Registrar's Submissions on Urgent Thaçi Defence Request for Temporary Release on Compassionate Grounds*, 31 August 2023, confidential and *ex parte*, paras. 19, 22, 25, 34 (a public redacted version was filed on 11 September 2023).

home, subject to further specified conditions.²⁹ In particular, the Trial Panel required that:

During Mr Thaçi's visit at his parents' home, only those who currently reside at the home ([REDACTED], Mr Haxhi Thaçi, [REDACTED]), escort personnel, and required medical personnel shall be permitted on the property. However, the only individuals permitted to be present in the area or room where Mr Thaçi interacts with his mother and/or father are [REDACTED], escort personnel and required medical personnel.³⁰

11. The secure and temporary transfer of Mr Thaçi to Kosovo to visit his father took place on 2 September 2023, and all of the stipulated conditions were fulfilled. Again, the Registrar noted that [REDACTED].³¹

12. On 28 January 2025, the Defence filed a third request for the temporary release of Mr Thaçi on compassionate grounds, due to the deteriorated medical condition of his father, who was hospitalised twice during the month of January 2025.³² The SPO opposed this request.³³ The Registry confirmed the feasibility of the requested visit and proposed conditions including that the visit be limited to one day; the Registry further proposed other alternatives, such as [REDACTED] additional video visits between Mr Thaçi and his parents.³⁴ On 31 January 2025, the Trial Panel denied the Third Request, on the grounds that it was not convinced that the current medical condition of Mr Haxhi Thaçi constituted compelling considerations within the

²⁹ KSC-BC-2020-06/F01757, Trial Panel II, *Decision on Urgent Thaçi Defence Second Request for Temporary Release on Compassionate Grounds*, 1 September 2023, confidential and *ex parte*, paras. 23, 26 ("Thaçi Second Decision") (a public redacted version was filed on 21 September 2023).

³⁰ *Ibid.*, para. 26(f).

³¹ KSC-BC-2020-06/F01787, *Report of the Registrar Pursuant to Decision on Urgent Thaçi Defence Second Request for Temporary Release on Compassionate Ground*, 13 September 2023, confidential and *ex parte*, para. 16 ("Second Registrar's Report").

³² Third Request.

³³ KSC-BC-2020-06/F02878, *Prosecution response to third urgent THAÇI release request*, Confidential and *ex parte*, 30 January 2025, para. 1 (a public redacted version was filed on 7 February 2025.)

³⁴ KSC-BC-2020-06/F02879, Registrar's Submissions on Urgent Thaçi Defence Third Request for Temporary Release on Compassionate Grounds, Confidential and *ex parte*, paras 15, 27 (a public redacted version was filed on 10 February 2025).

meaning of Rule 56(3) of the Rules,³⁵ noting, *inter alia*, that his condition appeared to have since stabilised.³⁶ The Trial Panel ordered the Registrar to facilitate [REDACTED] additional video visits with Mr Thaçi's parents on [REDACTED] February 2025, given the importance of contact with close family members and in light of his father's medical condition.³⁷

III. APPLICABLE LAW

13. Article 36(1) of the Kosovo Constitution and Article 8(1) of the European Convention on Human Rights ("Convention") guarantee the right to respect for family life. The European Court of Human Rights has ruled that it is an essential part of a prisoner's right to respect for family life that the prison authorities assist him or her in maintaining contact with his or her close family.³⁸

14. Pursuant to Rule 56(3), upon request by a detained person or *proprio motu*, the Panel may order the temporary release of a detained person, where compelling humanitarian grounds justify such release. Pursuant to Rule 56(5) of the Rules, the Panel may impose such conditions upon the release as deemed appropriate to ensure the presence of the detained person.

15. As noted by a Panel of the Court of Appeals Chamber, while Article 8 of the Convention does not guarantee an unconditional right to leave prison to visit a sick

³⁵ Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ("Rules").

³⁶ KSC-BC-2020-06/F02887, Trial Panel II, *Decision on Thaçi Defence Third Urgent Request for Temporary Release on Compassionate Grounds*, Confidential and *ex parte*, 31 January 2025 ("Thaçi Third Decision"), para. 12.

³⁷ Thaçi Third Decision, para. 15.

³⁸ ECtHR, *Chaldayev v. Russia*, 33172/16, Third Section, Judgment, 28 May 2019, § 59; *Messina v. Italy* (no. 2), 25498/94, Second Section, Judgment, 28 September 2000, § 61; *Kurkowski v. Poland*, 36228/06, Fourth Section, Judgment, 9 April 2013, § 95; *Vintman v. Ukraine*, 28403/05, Fifth Section, Judgment, 23 October 2014, § 78.

relative or attend their funeral, every limitation on this right must be justifiable as being “necessary in a democratic society”. Among the factors to be considered in this assessment are the stage of the proceedings, the nature of the criminal offence, the accused’s character, the gravity of the relative’s illness, the degree of kinship, the possibility of escorted leave and other circumstances informing the alleged “humanitarian” grounds.³⁹

16. Visiting a close relative in critical condition of health has been accepted, under certain conditions, by this and other jurisdictions, as a compelling humanitarian ground warranting temporary release.⁴⁰ In particular, Mr Kadri Veseli was authorised to visit his father at the hospital, who was in a critical condition, and his immediate family members, for a period of four days.⁴¹ During the same trip, he was authorised to visit his mother in her home, who was 92 years-old, blind and bedridden.⁴² Similarly, Trial Panel II found that the poor health situation of Mr Hysni Gucati’s mother qualified as a compelling consideration when deciding in favour of granting his custodial visits on two previous occasions.⁴³

³⁹ KSC-CA-2022-01/F00020/RED, Court of Appeals Panel, *Public Redacted Version of Decision on Gucati’s Third Request for Temporary Release on Compassionate Grounds*, 30 June 2022 (“Third Gucati Decision”), para. 11; KSC-CA-2022-01/F00043/RED, Court of Appeals Panel, *Public Redacted Version of Decision on Gucati’s Fourth Request for Temporary Release on Compassionate Grounds*, 22 September 2022 (“Fourth Gucati Decision”), para. 16.

⁴⁰ Third Gucati Decision, para. 13; Fourth Gucati Decision, para. 18.

⁴¹ KSC-BC-2020-06/F00271/RED, Pre-Trial Judge, *Public Redacted Version of Decision on Veseli Defence Request for Temporary Release on Compassionate Grounds*, 11 May 2021 (“Veseli First Decision”), paras. 14, 18. Mr Veseli was thereafter authorised to attend the funerals of his father and his mother: see KSC-BC-2020-06/F00386/RED, Pre-Trial Judge, *Public Redacted Version of Second Decision on Veseli Defence Request for Temporary Release on Compassionate Grounds*, 16 July 2021; KSC-BC-2020-06/F00640, Pre-Trial Judge, *Public Redacted Version of Third Decision on Veseli Defence Request for Temporary Release on Compassionate Grounds*, 17 January 2022.

⁴² KSC-BC-2020-06/F00276/RED, *Public Redacted Version of Decision on Veseli Defence Request for Modification of Decision KSC-BC-2020-06/F00271*, 11 May 2021., paras. 7-12.

⁴³ Third Gucati Decision, para. 13, referring to: KSC-BC-2020-07/F00618/RED, Trial Panel I, *Public Redacted Version of Decision on Second Gucati Defence Request for Temporary Release on Compassionate Grounds*, 3 June 2022, paras 19-20, and KSC-BC-2020-07/F00604/RED, Trial Panel I, *Public Redacted Version of Decision on Gucati Defence Request for Temporary Release on Compassionate Grounds*, 16 May 2022 (“Gucati May 2022 Decision”), paras. 15-16. Mr Gucati was subsequently authorised to visit his mother three other times. See for example, KSC-CA-2022-01/CR001/F00012/RED, Pre-Trial Judge, *Public*

IV. SUBMISSIONS

17. Mr Thaçi seeks urgent permission to visit his [REDACTED] father in [REDACTED], in light of his critical medical condition. Mr Haxhi Thaçi's health has deteriorated since the Trial Panel issued the Thaçi Third Decision. While, at the time, the Trial Panel concluded that Mr Haxhi Thaçi's medical condition appeared to have stabilised,⁴⁴ it has now deteriorated further, justifying his renewed hospitalisation between [REDACTED] February 2025. Mr Thaçi was admitted "in a grave clinical state", [REDACTED].⁴⁵ He has been diagnosed with [REDACTED].⁴⁶ On [REDACTED] February 2025, his doctor observed "only slight improvement in clinical state despite regular therapy", and diagnosed a "poor long term prognosis" despite a continuous "intensive treatment".⁴⁷ Similarly, on [REDACTED] February 2025, his treating doctor concluded that "[d]ue to the patient's critically serious overall condition, with multiple systemic health issues, the patient's condition may deteriorate at any time."⁴⁸

18. The current medical situation of Mr Haxhi Thaçi should be viewed in light of the following factors:

- He is of an advanced age – [REDACTED].

Redacted Version of Decision on Gucati Request for Fifth Custodial Visit on Compassionate Grounds, 24 April 2023.

⁴⁴ Thaçi Third Decision, para. 12.

⁴⁵ [REDACTED] February 2025 Medical Report.

⁴⁶ [REDACTED] February 2025 Medical Report and [REDACTED] February 2025 Specialist Report.

⁴⁷ [REDACTED] February 2025 Medical Report.

⁴⁸ [REDACTED] February 2025 Specialist Report.

- He was hospitalised in mid-2023 because of [REDACTED],⁴⁹ described by his medical team as [REDACTED].⁵⁰ At that time, his symptoms⁵¹ were similar to those experienced in his January 2025 hospitalisations, *i.e.* [REDACTED].⁵²
- He was hospitalised three times in a month between January and February 2025, with his medical report indicating he should be “hospitalised **at any time** if there is no improvement in his condition”.⁵³
- His degraded health justified his re-hospitalisation between [REDACTED] February 2025.⁵⁴
- While average life expectancy depends on many complex factors including gender, lifestyle, date of birth, country of origin and residence, and access to health care, an assessment of which is beyond the expertise of this court, the World Bank indicates that the average Kosovar male life expectancy at birth is 77.⁵⁵

19. Mr Thaçi is extremely distressed by his father’s condition and wishes to provide him with support and to comfort his mother and wife who are similarly distressed. Mr Thaçi is concerned that his father’s health may quickly deteriorate further, without warning, and he may not recover. In these circumstances, Mr Thaçi’s father’s medical condition constitutes urgent, compelling and exceptional circumstances justifying Mr Thaçi’s temporary release on humanitarian grounds, pursuant to Article 8 of the Convention, Article 36(1) of the Constitution and Rule 56(3) of the Rules.

⁴⁹ Thaçi Second Request, para. 1.

⁵⁰ Thaçi Second Request, Annex 1, Medical report for Mr. Haxhi Thaqi dated 28 August 2023.

⁵¹ Thaçi Second Request, Annex 1, Medical report for Mr. Haxhi Thaqi dated 28 August 2023, mentioning [REDACTED].

⁵² January 2025 Medical Reports, pp. 6, 8.

⁵³ January 2025 Medical Reports, p. 6.

⁵⁴ [REDACTED] February 2025 Medical Report.

⁵⁵ World Bank Group, ‘Life expectancy at birth (years)’, 2022, <https://genderdata.worldbank.org/en/indicator/sp-dyn-le00-in?gender=male>.

20. The [REDACTED] February 2025 Specialist Report indicates that due to Mr Haxhi Thaçi's critically serious overall condition, "hospitalisation may be required at any time if there is no improvement".⁵⁶ Therefore, after his discharge on [REDACTED] February 2025, Mr Haxhi Thaçi was brought again by his family to stay at [REDACTED], because of its proximity to the main hospital at which he is being treated. This is an address which is known to the SPO. Staying with Mr Haxhi Thaçi in this house are his wife, [REDACTED], his carer, [REDACTED], as well as Mr Thaçi's wife and son. The presence of the carer is needed because Mr Haxhi Thaçi's [REDACTED].⁵⁷ In these circumstances, Mr Thaçi should be permitted to have contact not only with his father, but also with his mother, his carer [REDACTED] and his wife. [REDACTED] agrees to vacate the house when Mr Thaçi would visit his father. In the instant case, it is both humane and essential for Mr Thaçi to comfort his mother and wife in person at this time.

21. Mr Thaçi, who surrendered voluntarily to the KSC's jurisdiction, is not a flight risk.⁵⁸ He has always cooperated with the relevant authorities regarding his detention. Any risks arising from a limited period of escorted custodial provisional release are greatly mitigated by Mr Thaçi having been provisionally released twice in similar circumstances, during which time he followed all instructions of the chief custody officers and escorting officers,⁵⁹ and returned to the Detention Unit in The Hague without incident. Mr Thaçi has no objection to submitting to the same logistical measures and security conditions that were imposed on him during his previous limited periods of provisional release to visit his mother and father.⁶⁰

⁵⁶ [REDACTED] February 2025 Specialist Report.

⁵⁷ [REDACTED] February 2025 Specialist report.

⁵⁸ See F02781, para. 17, where the Trial Panel recently confirmed its previous findings that Mr Thaçi was not a flight risk, such that his detention is not justified based on a risk of flight.

⁵⁹ First Registrar's Report, para. 18; Second Registrar's Report, para. 16.

⁶⁰ Thaçi First Decision, para. 24; Thaçi Second Decision, para. 26.

22. While the Trial Panel modified Mr Thaçi's conditions of detention in December 2023 on the grounds that he would have provided unprivileged visitors with information elicited during the testimony of protected witness,⁶¹ it is not alleged that such disclosure would have occurred during any visits of his parents or wife. Similarly, while Mr Thaçi has been charged – in addition to the charges in these proceedings – with criminal offences against the administration of justice and public administration and criminal offences against public order in Case 12,⁶² Mr Thaçi remains presumed innocent and that his parents and wife have no connection with the contempt allegations in Case 12.⁶³ The Defence stresses that the requested visit would occur in [REDACTED], in the presence of his father, his mother, his carer and his wife, without any other visitor. Therefore, any perceived risk is sufficiently restricted by Mr Thaçi remaining in the permanent custody of the Specialist Chambers during his transfer and at his house, where he will be constantly within both sight and earshot of escorting officers.⁶⁴

23. Finally, in light of the condition of Mr Thaçi's father, the Defence requests that this visit be organised as soon as possible. Mr Thaçi wishes to see his father but also wants to attend the testimony of the next witness W04491, in person, in accordance with Articles 21(4)(e) and (f) of the Law. Therefore the Defence seeks a visit of one (1) day in order to limit any disruption to the court calendar. Mr Dastid Pallaska, Co-Counsel for Mr Thaçi, will be the contact point for the Registry on behalf of the Defence.

⁶¹ See *contra*, Thaçi Third Decision, para. 13.

⁶² See *contra*, Thaçi Third Decision, para. 13.

⁶³ KSC-BC-2023-12/F00037, Decision on Request for Arrest Warrants and Related Matters, 29 November 2024 ("Decision on the Arrest Warrants"). A public redacted version was filed on 19 December 2024.

⁶⁴ See Thaçi First Decision, para. 24(f); Thaçi Second Decision, para. 26 (e).

V. CLASSIFICATION

24. This filing is classified as confidential and *ex parte* as it refers to sensitive medical information concerning Mr Thaçi's father. A public redacted version will be filed in due course.

VI. CONCLUSION

25. For the above reasons, the Defence respectfully requests that the Trial Panel order the immediate temporary release of Mr Thaçi on compassionate grounds, for a period of one (1) day, to allow him to visit his father, in the presence of [REDACTED], at [REDACTED].

[Word count: 3889 words]

Respectfully submitted,



Luka Misetic

Counsel for Hashim Thaçi

Friday, 14 February 2025

At The Hague, The Netherlands