

**In:** KSC-BC-2020-06/IA036  
KSC-BC-2020-06/IA037  
KSC-BC-2020-06/IA038  
KSC-BC-2020-06/IA040  
**Specialist Prosecutor v. Hashim Thaçi, Kadri Veseli, Rexhep Selimi and Jakup Krasniqi**

**Before:** Court of Appeals Panel  
Judge Michèle Picard  
Judge Kai Ambos  
Judge Nina Jørgensen

**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 July 2025

**Language:** English

**Classification:** Public

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**Joint Defence Request to Court of Appeals Panel**

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**Specialist Prosecutor's Office**

Kimberly P. West

**Counsel for Hashim Thaçi**

Luka Misetić

**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. Pursuant to previous instruction by the Court of Appeals Panel,<sup>1</sup> the Defence for Messrs. Thaçi, Veseli, Selimi and Krasniqi (“the Defence”) hereby requests approval to file one consolidated appeal encapsulating the Five Issues certified for appeal in Trial Panel II’s Decisions F03297,<sup>2</sup> F03298,<sup>3</sup> F03299,<sup>4</sup> and F03312<sup>5</sup> and for an increase in word count (“Request”).

## II. SUBMISSIONS

2. Each of the Five Issues certified for appeal concern similar issues concerning the interpretation and application of Rule 149.<sup>6</sup> In light of the overlapping Issues, to avoid unnecessary repetition, and in the interests of efficiency and expediency, the Defence submits that good-cause exists for the Defence to file one consolidated appeal.
3. Further, the Defence requests a word extension of an extra 6,000 words. Should the Panel grant the above Request, the Defence will be addressing arguments concerning Five Issues. The Defence submits that an extension of double the word count in one consolidated appeal will be considerably more accommodating to all Parties than four<sup>7</sup> separate appeals of 6,000 words each

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<sup>1</sup> Email from CMU to Defence, 5 June 2025 at 17:29.

<sup>2</sup> F03297, Trial Panel II, *Decision on Joint Defence Request for Leave to Appeal Decision on the Admission of Expert Evidence of Witness W04875*, 1 July 2025, public, para 49(a).

<sup>3</sup> F03298, Trial Panel II, *Decision on Joint Defence Consolidated Request for Leave to Appeal Decisions on the Admission of Expert Evidence of Witnesses W04826 and W04874 (F03201 and F03203)*, 1 July 2025, public, para 48(a).

<sup>4</sup> F03299, Trial Panel II, *Decision on Joint Defence Request for Leave to Appeal Decision on Prosecution Motion for Admission of Documents concerning Murder Victims and Related Request*, 1 July 2025, public, para 28(a).

<sup>5</sup> F03312, Trial Panel II, *Decision on Joint Defence Request for Certification to Appeal the Decision on Prosecution Motion for Admission of International Reports*, 7 July 2025, public, para 52(a).

<sup>6</sup> F03297, para 5; F03298, para 5; F03299, para 5; F03312, para 5.

<sup>7</sup> As the two Issues certified in F03297 would be dealt with in one appeal.

(24,000). No prejudice will be caused to any party should the Request be granted.

**Word count: 347**

**Respectfully submitted on Tuesday, 8 July 2025,  
at The Hague, The Netherlands.**



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Luka Misetić  
Lead Counsel for Hashim Thaçi



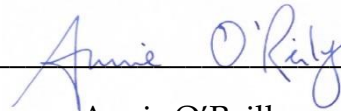
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Rodney Dixon KC  
Lead Counsel for Kadri Veseli



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Kerrie Ann Rowan  
Co-Counsel for Kadri Veseli



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Annie O'Reilly  
Co-Counsel for Kadri Veseli



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Geoffrey Roberts  
Lead Counsel for Rexhep Selimi



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Eric Tully  
Co-Counsel for Rexhep Selimi



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Chad Mair  
Co-Counsel for Rexhep Selimi



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Rudina Jasini  
Co-Counsel for Rexhep Selimi



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Venkateswari Alagendra  
Lead Counsel for Jakup Krasniqi



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Aidan Ellis  
Co-Counsel for Jakup Krasniqi



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Shyamala Alagendra Khan  
Co-Counsel for Jakup Krasniqi

A handwritten signature in black ink, appearing to read 'Băieșu', with a long horizontal stroke extending to the right.

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Victor Băieșu  
Co-Counsel for Jakup Krasniqi