

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

Joint Defence Request to Court of Appeals Panel

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,¹ 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 F03297,² F03298,³ F03299,⁴ and F03312⁵ 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 149.⁶ 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 four⁷ separate appeals of 6,000 words each

¹ Email from CMU to Defence, 5 June 2025 at 17:29.

² 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).

³ 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).

⁴ 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).

⁵ 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).

⁶ F03297, para 5; F03298, para 5; F03299, para 5; F03312, para 5.

⁷ 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.**



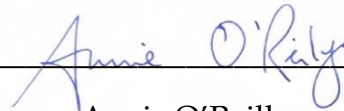
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A handwritten signature in black ink, appearing to read 'Băieșu', with a long horizontal stroke extending to the right.

Victor Băieșu
Co-Counsel for Jakup Krasniqi