

**In:** KSC-BC-2020-05/R001/IA001  
**The Prosecutor v. Salih Mustafa**

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

**Registrar:** Fidelma Donlon

**Filed by:** Anni Pues, Victims' Counsel

**Date:** 26 September 2025

**Language:** English

**Classification:** **Public**

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**Victims' Counsel's request for leave to submit a further reply to Mustafa's  
response**

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**Victims' Counsel**

Anni Pues

**Counsel for Mustafa**

Julius von Bóné

## I. INTRODUCTION

1. With this submission, Victims' Counsel requests leave to submit the subsequent brief reply to Mustafa's Reply to Victims' Counsel's Response to Mustafa's appeals submissions.<sup>1</sup>

## II. SUBMISSION

2. Rule 170 of the Rules of Procedure and Evidence does not provide for the possibility to respond to the appellant's reply. Victims' Counsel does not seek to make any further substantive submissions discussing the appeals questions. This has been done previously and hopefully unambiguously, although Mustafa misrepresents the arguments in his response. The request for leave is limited to one specific item, where Victims' Counsel is falsely misrepresented. Victims' Counsel therefore hopes that leave will be granted and the following submission accepted on an exceptional basis.
3. Victims' Counsel does seek to refute publicly that there is, as Mustafa contends, no interest on her part to pursuit any alternative pathways to achieve full reparations.<sup>2</sup> She has made clear in various oral and written submissions that she wishes the State of Kosovo to play an active role in fulfilling the right to reparations for victims.<sup>3</sup>
4. The only point is that the appeals proceedings are not the place to discuss such a pathway, proceedings before the Single Judge are. Victims' Counsel has made the Single Judge aware of Mustafa's submission, but she does not have the legal means to formally pursuit the suggested legal construct, the onus lies

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<sup>1</sup> KSC-BC-2020-05/R001/IA001/F00006/RED, Public Redacted Version of Mustafa's Reply to Victims' Counsel's Response to Mustafa's appeals submission, 21 September 2025.

<sup>2</sup> KSC-BC-2020-05/R001/IA001/F00006/RED, para 32.

<sup>3</sup> See only VC Closing Statement on Reparations, 15 September 2022.

with Mustafa. For Victims' Counsel it only matters that victims receive the awarded reparations as soon as possible, whether through payment by the State of Kosovo or by Mustafa.

5. Public records matter. For that reason, Victims' Counsel hopes that the Appeals Panel will grant leave as requested and accept this submission.

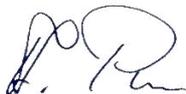
### III. RELIEF REQUESTED

6. Victims Counsel requests that  
**the Appeals Panel grants leave and accepts this submission to the record.**

### IV. CLASSIFICATION

7. This filing is submitted as public as it is limited to submissions made in public filings.

**Word count: 349**



**Anni Pues**  
**Victims' Counsel**

26 September 2025

At The Hague, the Netherlands