

In: KSC-BC-2020-05/CR001
The Specialist Prosecutor v. Mr. Salih Mustafa

Before: **Single Judge**
Judge Gilbert Bitti

Registrar: Dr Fidelma Donlon

Filing Participant: Defence

Date: 25 December 2025

Language: English

Classification: Public/Redacted

Public Redacted Version of

Defense's Additional Submissions in Relation to CR001/F00001

To be notified to:
Specialist Prosecutor's Office
Kimberly West

Specialist Counsel
for Salih Mustafa
Mr. Julius von Bóné

Registry
Fidelma Donlon

Additional Submissions

1. The Defence filed an **urgent** Request on 21 December 2025, which included an Annex 1.¹
2. In the Annex 1 of the urgent request, a medical report concerning the [REDACTED] of Mustafa's father was already included.
3. The Single Judge ordered, on 22nd of December 2025, that the Defence must file additional information regarding the [REDACTED] of Mustafa's father.²
4. In the Order the Single Judge further ordered a time-line for Responses from both the Registry and the SPO by Monday 29 December. The Defence could, if they wished, then Reply on 30 December 2025.
5. In its additional submissions, the Defence stressed once again the urgency of [REDACTED] of Mustafa's father. The Defence even wrote that it would probably not make a Reply, just in order not to lose any precious time, and hoped that Responses would be filed as soon as possible.³
6. Today, the Defence has learned that Mustafa's father has passed away on this day, 25th of December 2025.
7. The Defence wishes to stress at this point that, if the Defence files an **urgent request**, then there are plausible reasons for that **urgency**. The Defence regrets that further and additional filings were necessary and that time-lines were set as they were set.

Word count: 353



25 December 2025

Julius von Bóné

At The Hague, the Netherlands

Specialist Defence Counsel

¹ KSC-BC-2020-05/CR001, F00001, Defense, *Mustafa's urgent request for the temporary release*, 21 December 2025, confidential and *ex parte*, with Annex 1, confidential and *ex parte*.

² KSC-BC-2020-05/CR001/F00003, Order for Further Submissions in Relation to CR001/F00001, 22 December 2025, Confidential and *ex-parte*, para.5 and 7

³ KSC-BC-2020-05/CR001/F00004, Defense's Further Submissions in Relation to CR001/F00001 with Confidential and *ex-parte* ANNEX 1, 23 December 2025, para.14 and 15.