



SPECIALIST PROSECUTOR'S OFFICE
ZYRA E PROKURORIT TË SPECIALIZUAR
SPECIJALIZOVANO TUŽILAŠTVO

In: KSC-BC-2020-06
Before: Pre-Trial Judge
Judge Nicolas Guillou

Registrar: Dr Fidelma Donlon
Filing Participant: Specialist Prosecutor
Date: 2 June 2021
Language: English
Classification: Public

Prosecution request for extension of word limit

Specialist Prosecutor's Office

Jack Smith

Counsel for Victims

Simon Laws

Counsel for Hashim Thaçi

Gregory Kehoe

Counsel for Kadri Veseli

Ben Emmerson

Counsel for Rexhep Selimi

David Young

Counsel for Jakup Krasniqi

Venkateswari Alagenda

1. Pursuant to the framework set by the Pre-Trial Judge,¹ the next scheduled protective measures request from the Specialist Prosecutor's Office ('SPO') is due on Friday, 4 June 2021.

2. Pursuant to Article 36(1) of the Practice Direction,² the SPO requests that the Pre-Trial Judge authorise a limit of 15,000 words for this request.³ In the present exceptional circumstances, good cause exists for this extension in light of the evidential complexity of the matter, the voluminous nature of the materials being addressed, and the detailed submissions required in order to provide the Pre-Trial Judge with necessary information to assess the relevant security risks. In particular, this request will address the individual objective risks relating to approximately 40 witnesses.

Word count: 187



Jack Smith
Specialist Prosecutor

Wednesday, 2 June 2021
At The Hague, the Netherlands.

¹ Decision on Categorisation of Evidence Under Rule 109(c) and Related Matters, KSC-BC-2020-06/F00218, 12 March 2021, paras 22, 27(e); Framework Decision on Disclosure of Evidence and Related Matters, KSC-BC-2020-06/F00099, 23 November 2020 ('Framework Decision'), paras 60, 99(c).

² Registry Practice Direction, Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019 ('Practice Direction').

³ The standard word limit for motions is 6,000 words. *See* Article 41 of the Practice Direction.