



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

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

**Before:** The President of the Specialist Chambers  
Judge Ekaterina Trendafilova

**Registrar:** Dr Fidelma Donlon

**Filing Participant:** Specialist Prosecutor

**Date:** 26 July 2021

**Language:** English

**Classification:** Public

---

**Prosecution request for extension of time limits**

---

**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 Alagendra

1. Pursuant to Rule 9(5)(a) of the Rules,<sup>1</sup> the Specialist Prosecutor's Office ('SPO') requests an extension of the time limit to appeal the Jurisdiction Decision<sup>2</sup> until ten days after notification of the decision on certain constitutional challenges<sup>3</sup> or 27 August 2021, whichever is later.<sup>4</sup> Equally, the SPO does not oppose the extensions sought by the other Defence teams<sup>5</sup> and, if such extensions are granted, requests a commensurate extension of time – to 30 September 2021 – to respond to any appeals of the Jurisdiction Decision.

2. Good cause exists for the reasonable and proportionate extensions requested. The Jurisdiction Decision – which followed lengthy and voluminous submissions over the course of several months – addressed significantly complex and important matters, which have not been considered previously by the Court of Appeals. In order to provide focussed and complete submissions on such matters, the extensions requested are justified. Further, considering that certain constitutional challenges remain pending with the Pre-Trial Judge,<sup>6</sup> it is in the interest of fair and expeditious proceedings for the parties to have the opportunity to consider whether to appeal and how to craft their arguments in light of all potentially relevant decisions. Finally, the SPO notes the judicial recess, which concludes on 13 August 2021, and the fact of existing deadlines during the recess, including before the Court of Appeals.

---

<sup>1</sup> Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules'). Unless indicated otherwise, all references to 'Rule' or 'Rules' are to the Rules.

<sup>2</sup> Decision on Motions Challenging the Jurisdiction of the Specialist Chambers, KSC-BC-2020-06/F00412, 22 July 2021 ('Jurisdiction Decision'). For the applicable time limits, *see* Rule 170(1). *See also* Rule 97(3).

<sup>3</sup> The Pre-Trial Judge has indicated that he will issue a decision on such constitutional challenges after the judicial recess. *See* Jurisdiction Decision, KSC-BC-2020-06/F00412, para.14.

<sup>4</sup> The Veseli Defence has indicated *inter partes* that: (i) it intends to seek an equivalent extension (which the SPO does not oppose), and (ii) it does not oppose this request by the SPO.

<sup>5</sup> *See* Selimi, Krasniqi and Thaçi Defence Request for an Extension of Time to Submit their Appeals against the Pre-Trial Judge's Decision on Preliminary Motions, KSC-BC-2020-06/IA009/F00001, 23 July 2021.

<sup>6</sup> *See* Jurisdiction Decision, KSC-BC-2020-06/F00412, para.14. The SPO has submitted that these matters are not jurisdictional issues falling within the scope of Rule 97; at this juncture, these submissions are pending before the Pre-Trial Judge.

**Word count: 392**



---

**Jack Smith**  
**Specialist Prosecutor**

Monday, 26 July 2021

At The Hague, the Netherlands.