



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 September 2021  
**Language:** English  
**Classification:** Public

---

**Prosecution request for extension of time limit to respond to leave to appeal  
requests on decision KSC-BC-2020-06/F00413**

---

**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 Rules 9(5)(a) and 76,<sup>1</sup> the Specialist Prosecutor's Office ('SPO') requests an extension to 30 September 2021 in order to respond to the Defence Motions<sup>2</sup> seeking leave to appeal the decision on preliminary motions brought pursuant to Rule 97(1)(b).<sup>3</sup> Absent any adjustment to applicable deadlines the responses would be due on 8 September 2021 (i.e. just the standard 10-day response period provided for in the Rules).

2. Good cause<sup>4</sup> exists for the extension requested noting (i) the time which the Defence teams had for preparation of the Defence Motions,<sup>5</sup> (ii) the number of motions filed; (iii) the number of separate issues raised (being 32);<sup>6</sup> and (iv) the detailed nature and complexity of the points at issue. In the circumstances, it is appropriate and in the interests of justice for the parties to have an adequate opportunity to brief the issues in question. The SPO respectfully asks the Pre-Trial Judge to grant the requested extension to 30 September 2021.

**Word count: 345**

---

<sup>1</sup> Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules'). All references to 'Rule' or 'Rules' herein refer to the Rules, unless otherwise specified.

<sup>2</sup> Thaçi Defence Request for Certification to Appeal the "Decision on Defence Motions Alleging Defects in the Form of the Indictment", KSC-BC-2020-06/F00447; Defence Request for Certification to Appeal the Decision on Defence Motions Alleging Defects in the Form of the Indictment, KSC-BC-2020-06/F00445; Krasniqi Defence Request for Certification to Appeal the "Decision on Defence Motions Alleging Defects in the Form of the Indictment", KSC-BC-2020-06/F00446 (collectively 'Defence Motions').

<sup>3</sup> Decision on Defence Motions Alleging Defects in the Form of the Indictment, KSC-BC-2020-06/F00413, 22 July 2021 ('Decision').

<sup>4</sup> Rule 9(5)(a) provides that '[t]he Panel may, *proprio motu* or upon showing of good cause [,] extend or reduce any time limit prescribed by the Rules or set by the Panel'.

<sup>5</sup> The Decision was notified on 22 July 2021 and the deadline for submission of the Defence Motions was 27 August 2021.

<sup>6</sup> It is additionally noted that there is only a limited degree of overlap between the issues raised by the different Defence teams.



---

**Jack Smith**

**Specialist Prosecutor**

Thursday, 2 September 2021  
At The Hague, the Netherlands.