



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

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**Request for extension of time limit to respond to leave to appeal requests on  
decision KSC-BC-2020-06/F00450**

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**Specialist Prosecutor's Office**  
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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 a one-week extension to 6 October 2021 in order to respond to the Defence Motions<sup>2</sup> seeking leave to appeal the Decision.<sup>3</sup> Absent any adjustment to applicable deadlines the responses would be due on 29 September 2021.

2. Good cause<sup>4</sup> exists for the extension requested noting the (i) complex and novel nature of the matters adjudicated in the Decision,<sup>5</sup> and for which leave to appeal is now sought, (ii) number of issues for which leave to appeal is sought (being 9), (iii) concurrent complex litigation deadlines faced by the SPO in this case,<sup>6</sup> and (iv) extension which was granted to the Defence teams for preparation of the Defence Motions.<sup>7</sup> 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 limited extension sought and to adjust the applicable deadline to 6 October 2021.

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<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 Motions Challenging the Legality of the SC and SPO and Alleging Violations of Certain Constitutional Rights of the Accused", KSC-BC-2020-06/F00473; Veseli Defence Application for Leave to Appeal Decision on Motion to Challenge Jurisdiction on the Basis of Violations of the Constitution (KSC-BC-2020-06/F00450), KSC-BC-2020-06/F00473 (collectively 'Defence Motions').

<sup>3</sup> Decision on Motions Challenging the Legality of the SC and SPO and Alleging Violations of Certain Constitutional Rights of the Accused, KSC-BC-2020-06/F00450, 31 August 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> See *similarly* Consolidated Decision on Requests for Extension of Time, KSC-BC-2020-06/F00458 ('Extension Decision'), para.9.

<sup>6</sup> Responses to four appeals on jurisdictional issues (raising 29 grounds of appeal), as well as responses to three requests for leave to appeal the decision on challenges to the form of the indictment (raising 32 separate issues for which leave to appeal is sought) are all due on 30 September 2021.

<sup>7</sup> Extension Decision, KSC-BC-2020-06/F00458 (the Decision was notified on 1 September 2021 and the deadline for submission of the Defence Motions was extended to 17 September 2021).

**Word count: 403**



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**Jack Smith**

**Specialist Prosecutor**

Friday, 24 September 2021  
At The Hague, the Netherlands.