



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

In: KSC-BC-2020-04
Specialist Prosecutor v. Pjetër Shala

Before: Court of Appeals Panel
Judge Michèle Picard
Judge Emilio Gatti
Judge Nina Jørgensen

Registrar: Dr Fidelma Donlon

Filing Participant: Specialist Prosecutor

Date: 15 November 2021

Language: English

Classification: Public

Prosecution request for extension of time limit

Specialist Prosecutor's Office

Jack Smith

Counsel for Pjetër Shala

Jean-Louis Gilissen

1. Pursuant to Rule 9(5)(a) of the Rules,¹ the Specialist Prosecutor's Office ('SPO') requests a ten-day extension of the time limit to respond to the Defence Appeal against Decision on Motion Challenging the Establishment and Jurisdiction of the Specialist Chambers.² The Defence has indicated that it does not oppose this request.
2. Good cause exists for the reasonable and proportionate extension requested. The Appeals Panel has noted the significance, complexity, and novelty of the issues addressed in this case,³ and the requested extension is justified to provide focussed and complete submissions on these matters. Moreover, the SPO notes that it faces overlapping deadlines in this case, including its deadline to respond to the Defence's first Rule 102(3) request, including requesting any necessary protective measures.⁴ Finally, the SPO notes that this request is proportional to the extension the Defence sought⁵ and obtained⁶ in relation to these same issues.
3. Accordingly, the SPO seeks an extension of ten days from 19 November 2021 to 29 November 2021 for the filing of its response. The SPO does not object to a reasonable extension for the Defence reply deadline, as considered necessary.

Word count: 337

¹ Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules').

² Defence Appeal against Decision on Motion Challenging the Establishment and Jurisdiction of the Specialist Chambers, KSC-BC-2020-04/IA002/F00003, 9 November 2021, Public.

³ Decision on Extension of Time Limits, KSC-BC-2020-04/IA002/F00002, para.3

⁴ Decision on Requests to Vary Time Limits and Order Setting the Date for the Third Status Conference and for Submissions, KSC-BC-2020-04/F000078, KSc-BC-2020-04/F00078, 14 September 2021, Public, para.26(b) (setting deadline for the disclosure of materials requiring standard redactions of filing any requests for non-standard redactions/protective measures for within six weeks of the Defence's Rule 102(3) indication).

⁵ Defence Request for an Extension of Time to Appeal 'Decision on Motion Challenging the Establishment and Jurisdiction of the Specialist Chambers,' KSC-BC-2020-04/F00096, 27 October 2021, Public ('Decision on Extension of Time Limits').

⁶ Decision on Shala's Request for Variation of Time Limit, KSC-BC-2020-04/IA002/F00002, 28 October 2021, Public (granting the 10-day extension sought).



Jack Smith
Specialist Prosecutor

Monday, 15 November 2021

At The Hague, the Netherlands.