



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: Pre-Trial Judge
Judge Nicolas Guillou

Registrar: Dr Fidelma Donlon

Filing Participant: Specialist Prosecutor

Date: 9 December 2021

Language: English

Classification: Public

Prosecution request for extension of word limit

Specialist Prosecutor's Office

Jack Smith

Counsel for Victims

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Counsel for Kadri Veseli

Ben Emmerson

Counsel for Rexhep Selimi

David Young

Counsel for Jakup Krasniqi

Venkateswari Alagenda

1. Pursuant to Article 36(1) of the Practice Direction,¹ the Specialist Prosecutor's Office ('SPO') requests that the Pre-Trial Judge authorise a limit of 150,000 words for the SPO's pre-trial brief due on 17 December 2021.² This request is made sufficiently in advance, more than a week before the deadline, and good cause exists for the requested extension.
2. The pre-trial brief constitutes a summary of the evidence which the SPO intends to present regarding the crimes and modes of liability.³ As acknowledged by the Pre-Trial Judge,⁴ the charges against the Accused are complex and extend over a substantial period of time (from at least March 1998 through September 1999), cover a significant geographical area (more than 40 locations in at least 16 municipalities throughout Kosovo and two districts of northern Albania), and concern hundreds of victims.⁵ Further, the SPO intends to rely upon, and reference in footnotes throughout the pre-trial brief, the significant number of witnesses and exhibits which have been disclosed pursuant to Rule 102(1).⁶
3. The requested extension will enable the SPO to more fully present a summary of its case in the pre-trial brief and therefore would ultimately advance, not prejudice, these proceedings.

¹ Practice Direction. Registry Practice Direction, Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019 ('Practice Direction').

² The standard word limit is a total of 50,000 words. *See* Practice Direction, Article 44 (providing for 10,000 words for the contextual background and 10,000 words for each accused).

³ Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules'), Rule 95(4)(a).

⁴ *See, for example*, Decision on Remanded Detention Review Decision and Periodic Review of Detention of Kadri Veseli, KSC-BC-2020-06/F00576, 23 November 2021, Confidential, paras 106-109.

⁵ Annex 1 to Submission of corrected Indictment and request to amend pursuant to Rule 90(1)(b), KSC-BC-2020-06/F00455/A01, Strictly Confidential and *Ex Parte*.

⁶ *See, inter alia*, Prosecution submission of preliminary witness list, KSC-BC-2020-06/F00542, 22 October 2021; Prosecution submissions regarding the date for filing of a pre-trial brief, KSC-BC-2020-06/F00520, 12 October 2021, para.5.

Word count: 335



Jack Smith

Specialist Prosecutor

Thursday, 9 December 2021

At The Hague, the Netherlands.