

Case No.: KSC-BC-2020-04
Before: Pre-Trial Judge
Judge Nicolas Guillou
Registrar: Dr Fidelma Donlon
Date: 7 April 2022
Filing Party: Defence Counsel
Original Language: English
Classification: Public

THE SPECIALIST PROSECUTOR

v.

PJETËR SHALA

**Response to the
‘Prosecution request to amend its Rule 102(3) notice’**

Specialist Prosecutor’s Office:
Jack Smith

Counsel for Mr Pjetër Shala:
Jean-Louis Gilissen
Hédi Aouini

Counsel for Victims:
Simon Laws QC

1. The Defence for Mr Pjetër Shala (*'Defence'*) does not oppose the Prosecution request dated 25 March 2022 for leave to amend its Rule 102(3) notice.¹
2. In the Request, the Prosecution seeks leave to add to its Rule 102(3) notice: (i) 13 documents previously protected under Rule 107; (ii) two documents regarding *'the ruling on the confirmation of the indictment and admissibility of evidence in the case against Sabit GECI and Riza ALIJA, dated 24 November 2010'* as well as *'the record of the hearing on the confirmation of the indictment in the same case, dated 22 October 2010'*; and (iii) photographs of eight proposed witnesses which were taken from the video-recordings of their interviews upon a request to this effect by the Defence.²
3. While the Defence does not oppose the request, it emphasizes that it will need to be allowed sufficient time to review and analyse the proposed additional documents as well as the entirety of the material disclosed by the Prosecution.

Respectfully submitted,



Jean-Louis Gilissen
Specialist Defence Counsel



Hédi Aouini
Defence Co-Counsel

Word count: 187

¹ KSC-BC-2020-04, F00170, Prosecution request to amend its Rule 102(3) notice, 25 March 2022 (*'Request'*).

² Request, paras. 7, 8 and 10.