

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: Counsel for Kadri Veseli

Date: 9 June 2022

Language: English

Classification: Public

Defence Request for Word Limit Variation

Specialist Prosecutor's Office

Jack Smith

Counsel for Hashim Thaçi

Gregory Kehoe

Counsel for Kadri Veseli

Ben Emmerson

Counsel for Victims

Simon Laws

Counsel for Rexhep Selimi

David Young

Counsel for Jakup Krasniqi

Venkateswari Alagenda

I. INTRODUCTION

1. Pursuant to Article 36(1) and 41 of the Practice Direction on Files and Filings before the Kosovo Specialist Chambers ("Practice Direction"), the Defence for Mr Kadri Veseli ("Defence")¹ requests a variation of the word limit for submitting the Defence Motion for Disclosure Pursuant to Rule 103, following the Pre-Trial Judge's order at the 12th Status conference.²
2. More particularly, the Defence requests that it be entitled to submit a Motion which shall not exceed 8 000 words, *i.e.* an extension of 2000 words.

II. SUBMISSIONS

A. Good Cause

3. At the 12th Status conference, the Pre-Trial Judge requested the parties to put this issue in writing and invited the Defence "to substantiate their request".³ In order to properly comply with the Pre-Trial Judge's order, good cause exists to warrant a variation of the word limit, considering (i) the importance of disclosure obligations under Rule 103 of the Rules; (ii) the numerous allegations which form the basis of the Defence Motion; and (iii) the overall complexity of the issue.⁴

B. Timing of the Request

4. While no deadline was set on the matter,⁵ the Defence intends to file the Motion at the earliest possible date.

¹ The Defence teams are working closely on this matter in the hope that it will be possible to file the submission jointly.

² Transcript, 20 May 2022, p. 1254.

³ Transcript, 20 May 2022, p. 1254.

⁴ See Transcript, 20 May 2022, p. 1228-1254.

⁵ Transcript, 20 May 2022, p. 1254.

C. Lack of Prejudice

5. No prejudice is envisioned from granting the request. The Defence hereby gives its advance consent should the SPO wish a similar proportional word limit variation in response.

III. CONCLUSION

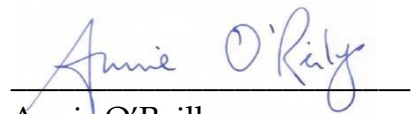
6. In light of the aforementioned, the Defence respectfully requests the Pre-Trial Judge to order the word limit variation sought in paragraph 2.

Word Count: 301

Ben Emmerson, CBE QC
Counsel for Kadri Veseli



Andrew Strong
Co-Counsel for Kadri Veseli



Annie O'Reilly
Co-Counsel for Kadri Veseli