

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: 11 October 2022

Language: English

Classification: Public

Veseli Defence Request for Word Limit Variation

Specialist Prosecutor's Office

Jack Smith

Counsel for Hashim Thaçi

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I. INTRODUCTION

1. Pursuant to Rule 9(5)(a) of the Rules of Procedure and Evidence, and Article 36(1) and 41 of the Practice Direction on Files and Filings before the Kosovo Specialist Chambers, the Defence for Mr Kadri Veseli, (“Defence”) requests a variation of the word limit to its consolidated response to SPO filings F00995, F00996 and F01003.¹
2. More specifically, the Defence requests that it be entitled to submit a consolidated response which shall not exceed 9,000 words, *i.e.* an extension of 3,000 words.

II. SUBMISSIONS

3. On 5 October 2022, the SPO filed 3 requests for protective measures to 102(3) material requested by the Defence. The Defence intends to submit one consolidated response to these three requests. A consolidated response will provide more cogent submissions by addressing overlapping issues in a single filing. Nonetheless, the SPO’s requests total over 70 annexes, for which the Defence needs sufficient words to respond meaningfully.² For these reasons, the Defence submits that the request is supported by good cause.
4. The request is timely, given the response deadline on the 17 October 2022. Furthermore, no prejudice is envisioned from granting the request.

¹ F00995/CONF/RED, Confidential Redacted Version of ‘Prosecution request for protective measures for certain information requested by the Defence pursuant to Rule 102(3) with strictly confidential and *ex parte* Annexes 1-30, 5 October 2022; F00996/CONF/RED, Confidential Redacted Version of ‘Prosecution request for protective measures for certain information requested by the Defence pursuant to Rule 102(3), with strictly confidential and *ex parte* Annexes 1-24’ F00996, 5 October 2022; F01003/CONF/RED, Confidential Redacted Version of ‘Prosecution request for protective measures for certain information requested by the Defence pursuant to Rule 102(3) with strictly confidential and *ex parte* Annexes 1-24’, 5 October 2022.

² Recently, a similar request was granted by the Court of Appeal Panel, *see* IA024-F00009, Krasniqi Defence Request for an Extension of Time and Word Limit to Reply to Victims’ Counsel Response to Defence Appeals (IA024-F00008), 20 September 2022; IA024-F00014, Decision on Defence Requests for Extension of Time and Word Limits to Reply, 22 September 2022.

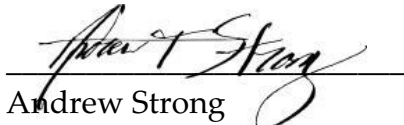
III. CONCLUSION

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

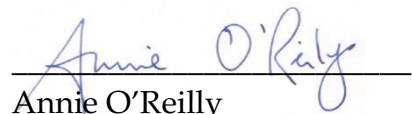
Word Count: 366



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