



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: Trial Panel II
Judge Charles L. Smith, III, Presiding Judge
Judge Christoph Barthe
Judge Guénaël Mettraux
Judge Fergal Gaynor, Reserve Judge

Registrar: Dr Fidelma Donlon

Filing Participant: Acting Specialist Prosecutor

Date: 13 February 2023

Language: English

Classification: Confidential

**Prosecution request for extension of words to file consolidated response to F01258
and F01271**

Specialist Prosecutor's Office

Alex Whiting

Counsel for Victims

Simon Laws

Counsel for Hashim Thaçi

Gregory Kehoe

Counsel for Kadri Veseli

Ben Emmerson

Counsel for Rexhep Selimi

David Young

Counsel for Jakup Krasniqi

Venkateswari Alagendra


1. Pursuant to the Trial Panel's instructions sent by email on Friday, 10 February 2023, the Specialist Prosecutor's Office ('SPO') will respond to the Selimi Defence request for adjournment¹ ('Selimi Request') and the joint Defence request for adjournment and other measures² ('Joint Request') by Tuesday, 14 February 2023, at 1600 hours. The SPO intends to file a consolidated response to the two requests. In that regard, and pursuant to Article 36(1) of the Practice Direction,³ the SPO requests a word extension of 4,500 words to a total of 10,500 words for the response.
2. Good cause exists for the requested word extension. Submitting one response will allow the SPO to respond to the two requests in the most efficient and concise manner, particularly as the Joint Request refers to, and quotes from, the Selimi Request, and the two requests have overlapping concerns. Moreover, the total word count including the requested extension would nevertheless fall 1,500 words below what would be available in combination were the SPO to respond to the requests individually. That the SPO's response must address multiple, disparate assertions, and that the requests implicate significant issues including the opening and schedule of trial, the SPO's case presentation, and witness security, further justify the word extension. No prejudice will be caused to the Defence or Victims' Counsel as the Trial Panel has informed the parties that they have the option of replying orally on 15 February 2023.
3. This filing is confidential pursuant to Rule 82(4). The SPO does not object to its reclassification as public.

Word Count: 316

¹ Selimi Defence Submissions on Proposed Trial Schedule and SPO Submission of List of First 12 Witnesses, KSC-BC-2020-06/F01258, 6 February 2023, Confidential.

² Joint Defence Request for Relief Pursuant to Article 21(4) of the Law and Rule 143 of the Rules, KSC-BC-2020-06/F01271, 9 February 2022, Confidential.

³ Practice Direction on Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019.



Alex Whiting

Acting Specialist Prosecutor

Monday, 13 February 2023

At The Hague, the Netherlands.