



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 Guénaél Mettraux
Judge Fergal Gaynor, Reserve Judge

Registrar: Dr Fidelma Donlon

Filing Participant: Acting Specialist Prosecutor

Date: 22 February 2023

Language: English

Classification: Public

Prosecution request for word count extension for consolidated Rule 155 motion

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 Sixth Oral Order,¹ the Specialist Prosecutor's Office ('SPO') will file its first Rule 155 application in respect of 16 witnesses by 1 March 2023 at 4.00 pm. The SPO intends to file one consolidated motion containing submissions for all 16 witnesses. In that regard, and pursuant to Article 36(1) of the Practice Direction,² the SPO requests authorisation to exceed the standard word limit and file a motion of no more than 18,000 words.
2. Good cause exists and no prejudice will be caused to the Defence or to the Victims' Counsel. Submitting one consolidated motion, instead of 16 separate motions, will allow the SPO to present the relevant information in the most efficient and concise manner, and avoid unnecessary repetition across filings. Moreover, the number of witnesses to be included, and the diverse elements that must be addressed to satisfy the requirements of Rule 155, further justify the word extension. In this respect, the word count requested is far less than the 96,000 word limit that would apply if the SPO filed 16 separate motions.

Word Count: 203



Alex Whiting

Acting Specialist Prosecutor

Wednesday, 22 February 2023

At The Hague, the Netherlands.

¹ Sixth Oral Order, 18 January 2023, T.1903 lines 14-22.

² Practice Direction on Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019.