

Case No.: KSC-BC-2020-04
Specialist Prosecutor v. Pjetër Shala

Before: **Trial Panel I**
Judge Mappie Veldt-Foglia, Presiding Judge
Judge Roland Dekkers
Judge Gilbert Bitti
Judge Vladimir Mikula, Reserve Judge

Registrar: Dr Fidelma Donlon

Date: 25 April 2023

Filing Party: Specialist Defence Counsel

Original Language: English

Classification: Confidential

THE SPECIALIST PROSECUTOR

v.

PJETËR SHALA

**Defence Request for an Extension of Time for its Response to the
Prosecution Motion for Judicial Notice of Facts of Common Knowledge and
Adjudicated Facts**

Specialist Prosecutor's Office:

Alex Whiting

Counsel for Victims

Simon Laws KC

Maria Radziejowska

Specialist Counsel for the Accused:

Jean-Louis Gilissen

Hédi Aouini

Leto Cariolou

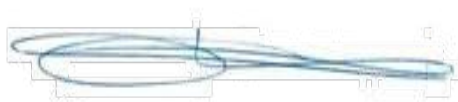
1. Pursuant to Rules 9(5)(a) and 76 of the Rules of Procedure and Evidence before the Kosovo Specialist Chambers (“Rules”), the Defence for Mr Pjetër Shala (“Defence”) submits this request for a 10-day extension to file its Response to the Prosecution Motion for Judicial Notice of Facts of Common Knowledge and Adjudicated Facts.¹
2. There is good reason to grant the requested extension. The complexity of the issues set out in the Motion as well as the number of proposed facts of common knowledge and adjudicated facts in its Annexes require careful analysis and consideration. In addition, the Defence is at present focused on preparing for the second evidentiary block, and must address important competing procedural obligations.²
3. The requested variation would allow the Defence sufficient time to present effective submissions that will assist the Trial Panel in its determination of the relevant issues at stake. No prejudice will be caused by the proposed extension.
4. This Request is filed as confidential, pursuant to Rule 82(3) of the Rules, as it relates to confidential filings. The Defence seeks leave to reclassify it as public in due course as it contains no confidential information.

Word count: 246

Respectfully submitted,

¹ KSC-BC-2020-04, F00467, Prosecution Motion for Judicial Notice of Facts of Common Knowledge and Adjudicated Facts with Public Annex 1 and Confidential Annexes 2 and 3, 14 April 2023 (confidential)(“Motion”).

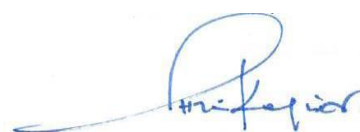
² See, for example, KSC-BC-2020-04, F00488, Prosecution Request to Amend the Exhibit List with Confidential Annex 1, 19 April 2023 (confidential, with confidential Annex 1).



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Tuesday, 25 April 2023
The Hague, the Netherlands