

**In:** KSC-BC-2020-06  
**The Specialist Prosecutor v. Hashim Thaçi, Kadri Veseli, Rexhep Selimi and Jakup Krasniqi**

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

**Registrar:** Dr Fidelma Donlon

**Filing Participant:** Specialist Counsel for Hashim Thaçi

**Date:** 31 August 2023

**Language:** English

**Classification:** Public

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**Public Redacted Version of URGENT Thaçi Defence Reply in Support of Second Request for Temporary Release on Compassionate Grounds**  
**With Confidential *Ex Parte* Annex 1**

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**Specialist Prosecutor's Office**  
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**Counsel for Hashim Thaçi**  
Gregory Kehoe

1. The Defence for Mr Hashim Thaçi (“Defence”) hereby replies to the SPO<sup>1</sup> and Registrar<sup>2</sup> response to its Second Request for Temporary Release on Compassionate Grounds.<sup>3</sup>
2. The Defence welcomes the SPO and Registry’s approval of a one day visit by Mr Thaçi to his parents, on Saturday 2 September 2023.
3. The Defence has been informed that Mr Thaçi’s father, Mr [REDACTED] Thaçi, has just been released from the [REDACTED] hospital [REDACTED]<sup>4</sup> and is now in the family house with Ms [REDACTED] Thaçi [REDACTED]. The [REDACTED] report issued for Mr [REDACTED] Thaçi upon his release specifies that [REDACTED].<sup>5</sup> Thus, both parents are now [REDACTED] in their house, their health remaining preoccupying.
4. The Defence observes that while the SPO requested that the visit be limited to Mr Thaçi’s parents,<sup>6</sup> the Registrar maintained that Mr Thaçi’s visit to his father or his mother could be organised with two immediate family members, be it at the hospital or the house.<sup>7</sup> Given that the KSC Registry has already supervised one visit of Mr Thaçi to the family house [REDACTED], the Registrar’s assessment of the feasibility of such visit in presence of two immediate family members justifies that Mr Thaçi be authorised to visit his parents in presence of two immediate family members, *i.e.* his

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<sup>1</sup> KSC-BC-2020-06/F01751, Prosecution response to urgent Thaçi Defence second request for temporary release, 30 August 2023 (“SPO Response”).

<sup>2</sup> KSC-BC-2020-06/F01752, Registrar’s Submissions on Thaçi Defence Request for Temporary Release on Compassionate Grounds, 31 August 2023 (“Registrar Submissions”).

<sup>3</sup> KSC-BC-2020-06/F01749, URGENT Thaçi Defence Supplementary Submissions in Support of Second Request for Temporary Release on Compassionate Grounds, 30 August 2023; KSC-BC-2020-06/F01750, URGENT Thaçi Defence Supplementary Submissions in Support of Second Request for Temporary Release on Compassionate Grounds, 30 August 2023.

<sup>4</sup> Annex 1.

<sup>5</sup> Annex 1.

<sup>6</sup> SPO Response, para. 3(e).

<sup>7</sup> Registrar Submissions, paras 23, 25.

wife [REDACTED] and his son [REDACTED], who would be particularly comforting in these specific circumstances. The other family members residing habitually at the house are willing to vacate the house during Mr Thaçi's visit if required to do so.

5. If Mr [REDACTED] Thaçi or Ms [REDACTED] Thaçi needed to be attended in person by a nurse or doctor during Mr Thaçi's visit, the Defence would endeavour to provide his/her identity to the Registry in advance.

6. In consequence, the Defence requests the Trial Panel to order the immediate temporary release of Mr Thaçi on compassionate grounds, on Saturday 2 September 2023, to allow him to visit both his father and his mother at their house, [REDACTED], in presence of his wife [REDACTED] and his son [REDACTED].

**[Word count: 468 words]**

Respectfully submitted,



**Gregory W. Kehoe**

**Counsel for Hashim Thaçi**

Thursday, 31 August 2023

At The Hague, The Netherlands