

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
Judge Christoph Barthe,
Judge Guénaél Mettraux
Judge Fergal Gaynor, Reserve Judge

Registrar: Dr Fidelma Donlon

Filing Participant: Counsel for Hashim Thaçi
Counsel for Kadri Veseli
Counsel for Rexhep Selimi
Counsel for Jakup Krasniqi

Date: 8 January 2024

Language: English

Classification: Public

**Joint Defence Further Response to Prosecution submission of list of witnesses
for 15 January to 4 April 2024 (F02007) with Confidential Annexes 1-14**

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I. INTRODUCTION

1. The Defence for Messrs Thaçi, Veseli, Selimi, and Krasniqi (collectively, “the Defence”) hereby notify their preliminary objections to the admissibility of exhibits to be tendered through witnesses notified as testifying between 15 January and 4 April 2024, as well as the anticipated length of their cross-examination, in its response to the Prosecution submission of list of witnesses for 15 January to 4 April 2024.¹ The Defence has already submitted its preliminary objections for W04489 and W04576².
2. The Defence reiterates that the objections and estimates contained herein are as accurate as possible. Nevertheless, cognisant of the fact that the circumstances of trial are such that the need to cross-examine and the length of cross-examination may change, the Defence undertakes to revise its estimates where such need arises and notify these revisions as soon as reasonably practicable.

II. SUBMISSIONS

3. The Defence’s cross-examination estimates, and objections in relation to each of the items identified for use with the Witnesses are set out in the accompanying Annexes.³
4. In relation to W04846, notwithstanding the objection to the document the SPO intends to use with this witness, the Defence for Mr Selimi notes that it intends to submit a separate filing challenging the scope of W04846’s evidence.

¹ KSC-BC-2020-06/F01657, Prosecution submission of list of witnesses for 15 January to 4 April 2024, with confidential Annexes 1 and 2, 14 December 2023.

² KSC-BC-2020-06/F02037, Joint Defence Response to Prosecution submission of list of witnesses for 15 January to 4 April 2024 (F02007) with Confidential Annexes 1 and 2, 27 December 2023.

³ See Annexes 1-14.

III. CONCLUSION

5. The Defence respectfully requests that the Trial Panel take notice of its submissions set out above and in the accompanying Annexes.

Word count: 286

Respectfully submitted on 8 January 2024



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