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SCSL-04-16-1  
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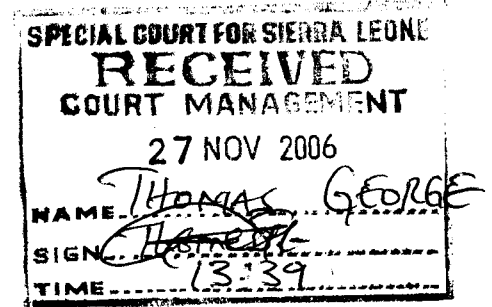
19335

**SPECIAL COURT FOR SIERRA LEONE  
OFFICE OF THE PROSECUTOR  
Freetown - Sierra Leone**

Before: Hon. Justice Richard Lussick, Presiding  
Hon. Justice Teresa Doherty  
Hon. Justice Julia Sebutinde

Registrar: Mr. Lovemore G. Munlo SC

Date filed: 27 November 2006



**THE PROSECUTOR**

**Against**

**Alex Tamba Brima  
Brima Bazzy Kamara  
Santigie Borbor Kanu**

Case No. SCSL-04-16-T

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**PUBLIC**

**URGENT PROSECUTION MOTION FOR RELIEF TO FILE A FINAL BRIEF NOT EXCEEDING 500  
PAGES**

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Office of the Prosecutor:  
Mr. Karim Agha

Defence Counsel for Alex Tamba Brima  
Mr. Kojo Graham  
Ms. Glenna Thompson

Defence Counsel for Brima Bazzy Kamara  
Mr. Andrew Daniels  
Mr. Mohamed Pa-Momo Fofanah

Defence Counsel for Santigie Borbor Kanu  
Mr. Geert-Jan Alexander Knoops  
Ms. Carry Knoops  
Mr. Abibola E. Manly-Spain

## I. INTRODUCTION

1. The Prosecution files this Motion asking the Trial Chamber for relief to file a Final Brief not exceeding 500 pages.
2. The Prosecution requests that this motion be dealt with by the Trial Chamber as a matter of urgency. The Prosecution requests that the Trial Chamber order expedited filings in relation to this motion, such as any Defence response would be filed by November 28 2006.

## II. Argument

3. On 30 October 2006 the Trial Chamber ordered the Prosecution to file, *inter alia*, one consolidated final trial brief in respect of the three Accused persons, which may include a joint statement of the law in relation to all three Accused persons and a statement of the facts in relation to each Accused separately<sup>1</sup>.
4. The Trial Chamber further ordered that “by agreement of the parties, the length of the consolidated final brief filed by the Prosecution shall not exceed 400 pages.”<sup>2</sup>
5. The Prosecution submits that it agreed to a 400 page limit, thinking this would suffice to set out its case in an accurate manner. It was also guided by the order in the CDF case containing the same page limit<sup>3</sup>. However, the AFRC Indictment contains 14 counts as compared to 8 in the CDF Indictment.. Therefore, in order to fulfill its duty and to lay out a comprehensive description and analysis of all the evidence and related legal issues, the Prosecution now realizes that the page limit of 400 does not suffice.
6. The Prosecution submits that – by giving the relief sought - the Defence would not be prejudiced as each Accused is entitled to file a brief of 200 pages, resulting in a total of 600 pages for the Defence.
7. It is therefore in the interests of justice to grant the motion accordingly.

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<sup>1</sup> *Prosecutor v Brima, Kamara, Kanu*, SCSL-4-16-T-581, “Order for Filing of Final Trial Briefs and Presentation of Closing Arguments”, 30 October 2006, para 1.

<sup>2</sup> *Ibid*, para 6 a.

<sup>3</sup> *Prosecution v Norman, Fofana, Kondewa*, SCSL-04-14-T-703, “Order for Filing Final Trial Briefs and Presenting Closing Arguments”, 29 September 2006, para 4.

### III. Relief sought

8. The Prosecution seeks relief to file a consolidated final trial brief that shall not exceed 500 pages.

Filed in Freetown,  
27 November 2006

For the Prosecution,



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Karim Agha  
Senior Trial Attorney