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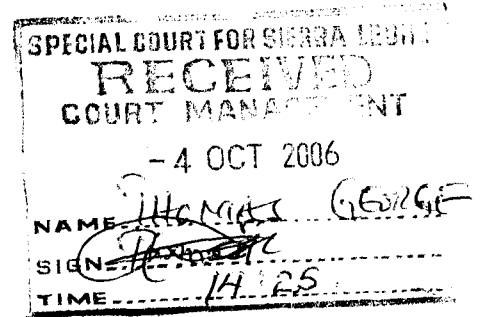
SPECIAL COURT FOR SIERRA LEONE

In Trial Chamber I

Before: Justice Bankole Thompson, Presiding  
Justice Benjamin Mutanga Itoe  
Justice Pierre Boutet

Registrar: Mr Lovemore Munlo, SC

Date: 4 October 2006



THE PROSECUTOR

-against-

SAMUEL HINGA NORMAN, MOININA FOFANA, and ALLIEU KONDEWA

SCSL-2004-14-T

PUBLIC

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JOINT PROSECUTION-DEFENCE APPLICATION FOR  
ADDITIONAL TIME TO FILE FINAL TRIAL BRIEFS

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**For the Office of the Prosecutor:**

Mr Christopher Staker  
Mr James C. Johnson  
Mr Joseph Kamara

**For Samuel Hinga Norman:**

Dr Bu-Buakei Jabbi  
Mr Alusine Sani Sesay  
Mr John Wesley Hall

**For Moinina Fofana:**

Mr Steven Powles  
Mr Arrow Bockarie  
Mr Michiel Pestman  
Mr Victor Koppe

**For Allieu Kondewa:**

Mr Charles Margai  
Mr Ansu Lansana  
Mr Yada Williams  
Ms Susan Wright

## SUBMISSIONS

1. Counsel for the Office of the Prosecutor (the “Prosecution”), the First Accused, Mr Samuel Hinga Norman, the Second Accused, Mr Moinina Fofana, and the Third Accused, Mr Allieu Kondewa (collectively, the “Parties”), hereby file their joint application for additional time to file their final trial briefs.
2. The Parties seek partial modification of this Chamber’s ‘Order for Filing Final Trial Briefs and Presenting Closing Arguments’ (the “Order”)<sup>1</sup>. Specifically, the Parties request an enlargement of the time-frame contained in order number one of the Order, which reads as follows:

Court Appointed Counsel for each Accused and the Prosecution shall file their respective final trial briefs on the same date as set by The Chamber in due course, and in any event within three weeks from the date that the Defence case for the Third Accused closes<sup>2</sup>.

3. Given the complexity, variety, and novelty of the charges contained in the consolidated indictment; the number of witnesses and volume of the evidentiary record; and the ultimate goal of presenting this Chamber with the most economical, persuasive, and effective documentary summary of the respective cases, the Parties submit that a time-frame of six weeks is necessary and reasonable for the preparation of final trial briefs<sup>3</sup>.
4. Further, as the defence case for the Third Accused shall be completed well before the end of October 2006, most likely sooner, the Parties submit that granting the instant application will in no way negatively impact the current judicial calendar<sup>4</sup>. Closing arguments may still proceed before the end of the year.
5. Accordingly, the Parties submit that it would be in the interests of justice to allow the additional time and respectfully urge the Chamber to modify the above-stated portion of its Order to read as follows:

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<sup>1</sup> *Prosecutor v. Norman et al.*, SCSL-2004-14-T-703, Trial Chamber I, 29 September 2006.

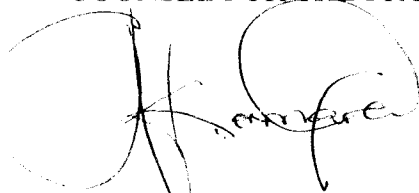
<sup>2</sup> *Ibid.* at page 4.

<sup>3</sup> *N.B.* The Rules of Procedure and Evidence do not prescribe any particular deadline for the submission of final trial briefs.

<sup>4</sup> The eighth trial session of the CDF case does not end until 7 December 2006, and the next judicial recess does not commence until 13 December 2006. See *Prosecutor v. Norman et al.*, SCSL-2004-14-T-595, Trial Chamber I, ‘Order Detailing Judicial Calendar’, 11 May 2006 and *Prosecutor v. Norman et al.*, SCSL-2004-14-T-710, President of the Special Court, ‘Order Scheduling Judicial Recess’, 3 October 2006.

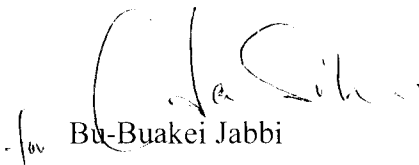
Court Appointed Counsel for each Accused and the Prosecution shall simultaneously file their respective final trial briefs six weeks from the close of all evidence in the CDF case.

COUNSEL FOR THE PROSECUTION



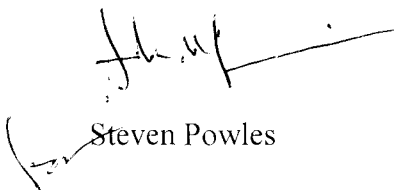
Joseph Kamara

COUNSEL FOR SAMUEL HINGA NORMAN



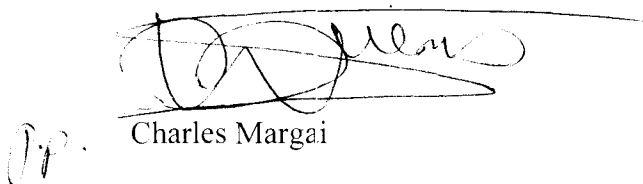
for Bu-Buakei Jabbi

COUNSEL FOR MOININA FOFANA



for Steven Powles

COUNSEL FOR ALLIEU KONDEWA



for Charles Margai