

011)

SCSL-11-02-PT  
( 55-56 )

55



**SPECIAL COURT FOR SIERRA LEONE**  
**TRIAL CHAMBER II**

Before: Justice Teresa Doherty, Presiding

Registrar: Ms. Binta Mansaray

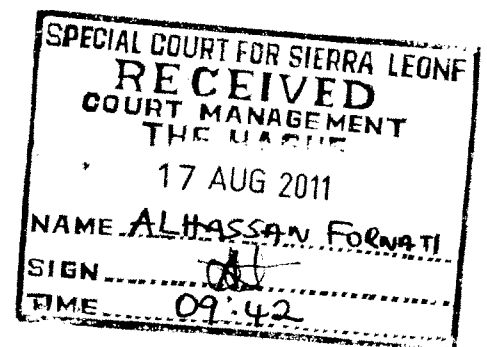
Case No: SCSL-11-02-PT

Date Filed: 17<sup>th</sup> August 2011

The Independent Counsel

V

Hassan Papa Bangura  
Samuel Kargbo  
Santigie Borbor Kanu  
Brima Bazy Kamara



---

Defence Motion for extension of time in which to serve Preliminary Motion

---

Office of the Independent Counsel  
Mr. Robert L. Herbst  
Mr. Mohammed Bangura  
Mr. Nathan Quick

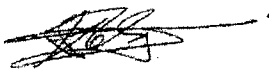
Counsel for the Accused  
Mr. Melron Nicol-Wilson  
Chief Charles A. Taku  
Mr. Kevin A. Metzger  
Mr. A.F. Serry Kamal

Office of the Prosecutor  
Ms. Brenda Hollis  
Mr. James Johnson

Office of the Principal Defender  
Mrs. Claire Carlton-Hanciles

1. The Defence files this motion pursuant to Rule 7 *bis* of the Rules of Procedure and Evidence (“Rules”) to request that the Trial Chamber grant an extension of time for the filing of preliminary motions in this case.
2. On 15<sup>th</sup> July 2011 Justice Doherty, at the preliminary hearing in respect of this matter, ruled that the Defence be allowed 25 days from the date on which the Independent Prosecutor provided disclosure to file and preliminary motions. The Defence were also given liberty to apply in respect of timing on any preliminary matters.
3. The Defence propose to file a joint motion in respect of preliminary matters relating primarily, but not exclusively to jurisdiction. Logistically it has proved impossible to file within the 25 days currently permitted as one of our number is currently in Rwanda carrying out investigations from a Defence perspective which may impact proposed the proposed motion.
4. Accordingly the Defence respectfully requests an extension of twenty one days for the filing of preliminary motions pursuant to Rule 7 *bis*. It is not believed that any prejudice will be caused to the Prosecution or any other party to these proceedings by said extension.

Respectfully submitted,



Kevin A. Metzger

Counsel for Santigie Borbor Kanu

Dated 15 August 2011