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SCSL-11-02-PT
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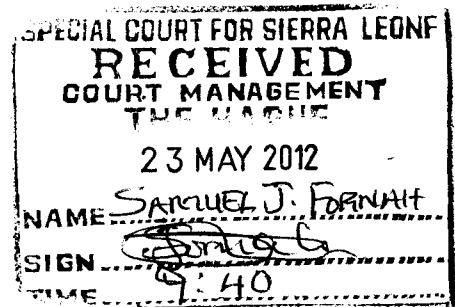
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SPECIAL COURT FOR SIERRA LEONE
TRIAL CHAMBER II

Before: Justice Teresa Doherty, Presiding Judge
Single Judge, Trial Chamber II

Registrar: Ms. Binta Mansaray
Case No. SCSL-11-02-PT
Date filed: 22 May 2012



The Independent Counsel

-V-

Hassan Papa Bangura
Samuel Kargbo
Santigie Borbor Kanu
Brima Bazy Kamara

Defence submissions on behalf of Santigie Borbor Kanu on the proposals contained within the Scheduling order of 1st May 2012 for the conduct of the trial

Independent Counsel :
Mr. Robert L. Herbst
Mr. Mohammed Bangura

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

Office of the Principal Defender:
Mrs. Claire Carlton-Hanciles

1. The Defence files this motion pursuant to the Scheduling Order filed on 1st May 2012.
2. Considering that at the time the Scheduling Order was made, Defence Counsel was not instructed as the contract for the Defence of Mr. Kanu was Suspended in September 2011 and not in force at the time of the order and further that Counsel for Mr. Kanu was unable to travel to Rwanda in order to have a consultation with his client until 12th May 2012 and that Counsel returned to the United Kingdom on 18th May 2012, the Defence respectfully beseeches the Honourable Court to extend time for the filing of his submission.
3. The Defence for the Accused Santigie Borbor Kanu is in agreement with the 4 points contained in the scheduling order dealing with propositions for the conduct of the trial. It is anticipated, as presently advised, that Mr Kanu will elect to give evidence, if required, and that there will be additional evidence called on the Accused's behalf from at least one witness who works in an administrative and/or operational capacity with the Rwanda Correctional Services. In the circumstances, if it is not proposed to convey the Accused to Freetown, it is accepted that any evidence he shall give or that shall be tendered on his behalf should be heard and adduced in Kigali.

Respectfully submitted,



Kevin A. Metzger

Counsel for Santigie Borbor Kanu

Dated 22 May 2012