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RSCSL-03-01-ES  
(12598-12600)

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RESIDUAL SPECIAL COURT FOR SIERRA LEONE  
CHURCHILLPLEIN 1, 2517 JW • THE HAGUE • THE NETHERLANDS  
P. O. BOX 19536, 2500CM • THE HAGUE • THE NETHERLANDS  
(BRANCH OFFICE :) JOMO KENYATTA ROAD • FREETOWN •  
SIERRA LEONE

Before: The Honourable Justice Teresa Doherty, Duty Judge

Registrar: Ms. Binta Mansaray

Date: 29 June 2020

In the matter of

PROSECUTOR Against CHARLES GHANKAY TAYLOR

Case No. RSCSL- 03-1-ES

Public

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TAYLOR'S REQUEST FOR EXTENSION OF TIME TO FILE A REPLY TO THE PROSECUTOR'S RESPONSE AND THE REGISTRAR'S SUBMISSION IN RESPONSE TO HIS MOTION FOR TEMPORARY TRANSFER TO A SAFE THIRD COUNTRY TO CONTINUE HIS IMPRISONMENT DUE TO MASSIVE OUTBREAK OF COVID-19 IN THE UK

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Office of the Prosecutor:

Mr. James C. Johnson

Defence Office:

Mr. Ibrahim Yillah

Counsel for Mr. Charles G. Taylor

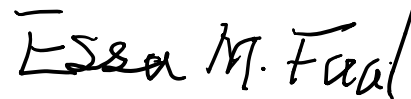
Mr. Essa M. Faal

RESIDUAL SPECIAL COURT FOR SIERRA LEONE	
<b>RECEIVED</b>	
COURT MANAGEMENT THE HAGUE	
29 JUN 2020	
NAME	Frances Ngakah-Smart
SIGN	
TIME	14:29

1. The Defence respectfully requests an extension of time within which it should file its reply to both the Prosecutor's Response as well as the Registrar's Submission to Mr. Taylor's request for temporary transfer to continue his imprisonment to a safe third country due to the massive outbreak of Covid 19 in the United Kingdom (UK) dated 24<sup>th</sup> June 2020. Ordinarily in accordance with the Rules, the time limit for the Defence's reply expires on today's date.
  
2. The reason for seeking extension of time is that Mr. Taylor was only served the Prosecutor's Response as well as the Registrar's Submissions on Friday, 26<sup>th</sup> June at 2:45 pm by one Mr. John Morgan, Senior Officer attached to HMP Franklands Prison in the UK. Immediately upon receipt of the various submissions, Mr. Taylor informed the Principal Defender by telephone call that Defence Office should seek an extension of time to reply as he needs a minimum of 72 hours to analyse the submissions and to telephone and give proper instructions to his pro bono counsel and the Defence Office. Mr. Taylor does not have access to email which he could use in real time to communicate with and give proper instructions to his team. Rather, Mr. Taylor depends on the public telephone system available at the HM Franklands Prisons in the UK to contact his lawyers and give instructions and he employs the same methodology when discussing motions and responses to applications because both his pro bono counsel as well as members of the Defence Office cannot call him because only he, Mr. Taylor is allowed to telephone his legal team and not the other way round, a constraint which the Defence submits affects Taylor's rights to adequate preparation of his defence.
  
3. Given that Mr. Taylor was only served on Friday, the 26<sup>th</sup> June 2020 and his request to hold telephone conferences with his pro bono counsel as well as the Principal Defender, it is reasonable that this Court grants an extension of time to the Defence to file its reply from Monday, 29<sup>th</sup> June 2020 to Monday, 6<sup>th</sup> July 2020 as such an extension would enable Mr Taylor prepare adequately to respond to the various submissions filed by the Registrar and the Prosecutor on an issue which the Defence submits impacts on Mr. Taylor's right to life.

4. The Defence files this Motion for extension of time pursuant to Rule 7bis of the Rules of Procedure and Evidence of the Residual Special for Sierra Leone which provides a legal basis for the extension the Defence seeks in this application.

Respectfully submitted,

A handwritten signature in black ink that reads "Essa M. Faal". The signature is written in a cursive style with a horizontal line above the first "E".

Essa M. Faal

Counsel for Mr. Charles G. Taylor