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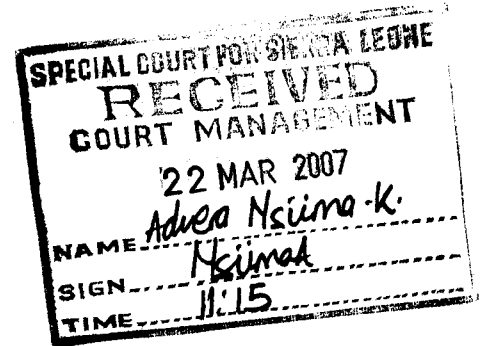
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SPECIAL COURT FOR SIERRA LEONE
OFFICE OF THE PROSECUTOR
Freetown – Sierra Leone

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

Acting Registrar: Mr. Herman von Hebel

Date filed: 22 March 2007



THE PROSECUTOR

Against

Charles Taylor

Case No. SCSL-03-01-PT

PUBLIC
URGENT PROSECUTION REQUEST FOR INTERIM MEASURES

Office of the Prosecutor:

Ms. Brenda J. Hollis
Ms. Ann Sutherland

Defence Counsel for Charles Taylor

Mr. Karim A. A. Khan
Mr. Roger Sahota

I. INTRODUCTION

1. Pursuant to Rule 73(A) of the Rules of Procedure and Evidence (“Rules”), the Prosecution files its urgent request for interim measures.

II. BACKGROUND

2. On 8 March 2007, the Prosecution filed “Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure (“Motion”)¹.
3. On 19 March 2007, the Prosecution filed “Urgent Prosecution Motion for Leave to Substitute a Supplemented Witness List as Annex A (4) of the Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure filed on 8 March 2007” (“Supplemental Motion”)², seeking leave for the witness list attached to the Motion to be supplemented, and if so granted, to substitute Annex A (4) of the Motion with Annex A (5) attached to the Supplemental Motion.
4. On the same day, the Defence filed “Response to Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure.”³
5. On 21 March 2007, the Prosecution filed “Prosecution’s Reply to ‘Defence Response to ‘Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and Non-Public Disclosure.’”⁴

III. URGENT REQUEST FOR INTERIM MEASURES

6. If protective measures order(s) sought in the Motions are issued prior to the forthcoming judicial recess, the Prosecution shall disclose to the Defence, prior to

¹ *Prosecutor v. Taylor*, SCSL-03-01-PT-200, “Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-public Disclosure”, 8 March 2007.

² *Prosecutor v. Taylor*, SCSL-03-01-PT-205, “Public Urgent Prosecution Motion for Leave to Substitute a Supplemented Witness List as Annex A(4) of the Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-public Disclosure filed on 8 March 2007,” 19 March 2007.

³ *Prosecutor v. Taylor*, SCSL-03-01-PT-207, “Defence Response to ‘Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure,’” 19 March 2007.

⁴ *Prosecutor v. Taylor*, SCSL-03-01-PT-208, “Prosecution’s Reply to ‘Defence Response to ‘Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and Non-Public Disclosure,’” 21 March 2007.

4 April 2007, redacted statements of all witnesses listed in the combined Annex filed with the Motion.

7. Absent such order(s), the Prosecution requests that the Trial Chamber issue an order no later than 29 March 2007 permitting the transmission of the above referenced disclosure material to the Court Management Section of the Registry no later than 30 March 2007, for disclosure to the Defence once a decision on protective measures has been rendered. This request and the interim measures sought are consistent with past practice⁵ and ensure that the Prosecution has fulfilled its disclosure obligations pursuant to Rule 66 (A) (ii) of the Rules.

IV. CONCLUSION

8. The Prosecution respectfully requests the Trial Chamber to grant the orders for protective measures sought in the pending Motions.⁶ If the Trial Chamber is unable to issue such order(s) prior to the forthcoming judicial recess, the Prosecution requests that the Trial Chamber issue an order no later than 29 March 2007 allowing transmission of disclosure material to the Court Management section as requested in paragraph 7 above.

Filed in Freetown,

22 March 2007

For the Prosecution,



Brenda J. Hollis
Senior Trial Attorney

⁵ April 2003 Motion (filed in cases relating to five accused: *Norman, Kallon, Sesay, Brima and Kamara*), April 2003 Decision (relating to the aforesaid five accused); April 2006 Motion (filed in this case – the Prosecution sought an order for permission to transmit material to Registry for disclosure to the accused upon a decision being rendered, which, in light of the decision, did not have to be ordered, see May 2006 Decision). See List of Authorities annexed for full citations of filings.

⁶ Motion and Supplemental Motion.

Index of Authorities

4831

1. *Prosecutor v. Norman*, SCSL-03-08-PT-21, Extremely Urgent Prosecution Motion to Allow Disclosure to the Registry and to Keep Disclosed Material Under Seal Until Appropriate Protective Measures Are in Place, 7 April 2003. (An example of one of the five motions filed).
2. *Prosecutor v. Norman*, SCSL-03-08-PT-25, Decision on the Prosecution Motion to Allow Disclosure to the Registry and to Keep Disclosed Material Under Seal Until Appropriate Protective Measures Are in Place, 17 April 2003. (An example of one of the five decisions filed).
3. *Prosecutor v. Taylor*, SCSL-03-01-PT-86, Confidential Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure and Urgent Request for Interim Measures, 4 April 2006.
4. *Prosecutor v. Taylor*, SCSL-03-01-PT-99, Decision on Confidential Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure and Urgent Request for Interim Measures and on Confidential Prosecution Motion for Leave to Substitute a Corrected and Supplemented List as Annex A of the Confidential Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure and Urgent Request for Interim Measures, 5 May 2006.
5. *Prosecutor v. Taylor*, SCSL-03-01-PT-200, Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure, 8 March 2007.
6. *Prosecutor v. Taylor*, SCSL-03-01-PT-205, Public Urgent Prosecution Motion for Leave to Substitute a Supplemented Witness List as Annex A (4) of the Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure filed on 8 March 2007, 19 March 2007.
7. *Prosecutor v. Taylor*, SCSL-03-01-PT-207, Confidential Response to “Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure”, 19 March 2007.
8. *Prosecutor v. Taylor*, SCSL-03-01-PT-208, Public Prosecution’s Reply to “Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure”, 19 March 2007.