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SCSL-03-01-A  
(137-140)

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**SPECIAL COURT FOR SIERRA LEONE  
OFFICE OF THE PROSECUTOR**

**IN THE APPEALS CHAMBER**

Before: Justice Shireen Avis Fisher, Pre-Hearing Judge

Registrar: Ms. Binta Mansaray

Date filed: 25 July 2012

**THE PROSECUTOR**

**Against**

**CHARLES GHANKAY TAYLOR**  
(Case No. SCSL-03-01-A)

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**PUBLIC**

**PROSECUTION RESPONSE TO DEFENCE MOTION FOR EXTENSIONS OF TIME AND  
PAGE LIMITS FOR WRITTEN SUBMISSIONS PURSUANT TO RULES 111, 112 AND 113**

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Office of the Prosecutor:

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Ms. Kate Gibson  
Ms. Magda Karagiannakis

SPECIAL COURT FOR SIERRA LEONE  
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## I. INTRODUCTION AND SUBMISSIONS

1. The Prosecution files this response to the “Defence Motion for Extensions of Time and Page Limits Pursuant to Rules 111, 112 and 113” (“**Motion**”).<sup>1</sup>
2. The Motion<sup>2</sup> establishes “good cause” for an extension of the time limits as required by Rule 116 of the Rules of Procedure and Evidence, and meets the “exceptional circumstances” for an extension of page limits as required by Article 6(G) of the Practice Direction on dealing with Documents in The Hague - Sub-Office. The Prosecution notes that the Defence does not oppose harmonization of extension of time limits.<sup>3</sup>
3. The Prosecution suggests that the Defence request for 90 *additional* days and 200 *additional* pages<sup>4</sup> for its Rule 111 submissions, and for 70 *additional* pages for its Rule 113 submissions<sup>5</sup> may be more generous than circumstances require. The Prosecution suggests that a *total* of 90 days and a *total* of 200 pages for Defence Rule 111 submissions would be warranted by the circumstances, as would an *additional* 30 pages for its Rule 113 submissions.
4. The Defence submissions at paragraph 16 regarding the time required for Rule 112 submissions would not prevent the Defence from preparing a full and adequate response, but would disadvantage the Prosecution who must deal with many more grounds of appeal. For the following reasons, the Prosecution suggests that the parties should be granted the same amount of time for their Rule 112 submissions as is granted for the Rule 111 Appellant’s Submissions. First, the Appellant’s Submissions benefit greatly from the review and research necessary for a party to identify its grounds of appeal. In this case, that translates into an additional 49 days of preparation for the “propositional” Rule 111 submissions. In addition, a response requires adequate time for a thorough review of the portions of the Judgement and Sentencing Judgement and the jurisprudence relied on by the other party and,

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<sup>1</sup> *Prosecutor v. Taylor*, SCSL-03-01-A-1305, Defence Motion for Extensions of Time and Page Limits Pursuant to Rules 111, 112 and 113, 24 July 2012.

<sup>2</sup> See Motion, paras. 9-15, 17-20.

<sup>3</sup> Motion, para. 17.

<sup>4</sup> Motion, para. 1 (i).

<sup>5</sup> Motion, para. 1 (iii).

additionally, time to analyse and evaluate other portions of the judgements and jurisprudence which fashion and support the positions that will be taken in the response.

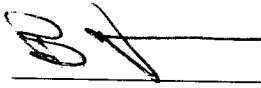
## II. CONCLUSION

5. The Defence has made the requisite showing for an extension of time and page limits for its Rule 111, 112 and 113 submissions. The Prosecution relies on the sound discretion of the Pre-Hearing Judge to determine the number of additional days and pages which would be justified by the circumstances of this case, with due regard to the Prosecution's submissions in paragraphs 3 and 4 above.

Filed in The Hague,

25 July 2012

For the Prosecution,



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Brenda J. Hollis

The Prosecutor

**INDEX OF AUTHORITIES****SCSL Cases*****Prosecutor v. Taylor, SCSL-03-01-A***

*Prosecutor v. Taylor, SCSL-03-01-A-1305, Defence Motion for Extensions of Time and Page Limits Pursuant to Rules 111, 112 and 113, 24 July 2012.*