

**UNITED
NATIONS**



Mechanism for International Criminal Tribunals

Case No: MICT-13-55-A

Date: 27 May 2016

Original: English

IN THE APPEALS CHAMBER

Before:

**Judge Theodor Meron, Presiding
Judge William Hussein Sekule
Judge Vagn Prüsse Joensen
Judge José Ricardo de Prada Solaesa
Judge Graciela Susana Gatti Santana**

Registrar:

Mr. John Hocking

THE PROSECUTOR

v.

RADOVAN KARADŽIĆ

PUBLIC

**PROSECUTION RESPONSE TO MOTION FOR FURTHER
EXTENSION OF TIME TO FILE NOTICE OF APPEAL**

The Office of the Prosecutor:

Laurel Baig
Barbara Goy
Katrina Gustafson

Counsel for Karadžić:

Peter Robinson

1. The Prosecution takes no position on Karadžić's request for a further extension of time to file his notice of appeal,¹ or his related funding complaints.² However, for the reasons already set out by the Appeals Chamber,³ should the Appeals Chamber decide to grant a further extension, it should be applied to both parties.

2. The Prosecution also notes that, in attempting to compare the resources available to the respective parties, the Motion appears to be premised on the incorrect assumption that the Prosecution has a team of lawyers working solely on the *Karadžić* appeal.⁴ As the Prosecution has already explained to the Defence,⁵ in light of the varying demands of the Office of the Prosecutor, Prosecution staff are expected to work on any one or more of the seven ongoing cases across the ICTY and MICT, as well as other matters relevant to the work of the Prosecution, depending on the needs of the office at any given time. Thus, Karadžić's claimed comparison of the alleged numbers of staff assigned to the Prosecution and Defence teams in this case⁶ does not translate into an accurate comparison of available resources.⁷

Word Count: 351



Katrina Gustafson
Senior Appeals Counsel

Dated this 27th day of May 2016
At The Hague, The Netherlands

¹ *Prosecutor v. Radovan Karadžić*, Case No. MICT-13-55-A, Motion for Further Extension of Time to File Notice of Appeal ("Motion"), 20 May 2016.

² See Motion, paras.4-6. See also *Prosecutor v. Radovan Karadžić*, Case No. MICT-13-55-A, Registrar's Submission on Funding on Appeal, 25 May 2016.

³ *Prosecutor v. Radovan Karadžić*, Case No. MICT-13-55-A, Decision on Motion for Extension of Time to File Notice of Appeal, 21 April 2016, p.2.

⁴ See Motion, paras.7, 14.

⁵ In a 31 March 2016 letter, the Prosecution responded to a 27 March 2016 Defence request for information regarding Prosecution resources assigned to the *Karadžić* appeal by explaining that it could not reliably predict the projected assignments of Prosecution staff members because Prosecution staff work across the ICTY and the MICT and may be assigned to work on any one of more of the ongoing ICTY or MICT cases, as well as other matters relevant to the work of the Prosecution, depending on the office's varying demands.

⁶ See Motion, paras.6-7.

⁷ *Contra* Motion, para.14.