

**Cour  
Pénale  
Internationale**



**International  
Criminal  
Court**

*Original: English*

*No.: ICC-01/14-01/18*  
**Date: 27 October 2025**

**THE APPEALS CHAMBER**

**Before:** Judge Solomy Balungi Bossa, Presiding Judge  
Judge Luz del Carmen Ibáñez Carranza  
Judge Gocha Lordkipanidze  
Judge Kimberly Prost  
Judge Erdenebalsuren Damdin

**SITUATION IN THE CENTRAL AFRICAN REPUBLIC II**

***IN THE CASE OF THE PROSECUTOR v. ALFRED ROMBHOT YEKATOM &  
PATRICE-EDOUARD NGAÏSSONA***

**Public Document**

**Ngaïssona Defence Response to the "Yekatom Defence Request for an extension  
of page limit", ICC-01/14-01/18-2829**

**Source: Defence of Patrice-Edouard Ngaïssona**

Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:

☒ The Office of the Prosecutor

☒ Counsel for the Defence

D30

D29

☒ Legal Representatives of the Victims  
V44

☐ Legal Representatives of the  
Applicants

☐ Unrepresented Victims

☐ Unrepresented Applicants  
(Participation/Reparation)

☐ The Office of Public Counsel for  
Victims

☒ The Office of Public Counsel for the  
Defence

☐ States' Representatives

☐ Amicus Curiae

## REGISTRY

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**Registrar**

M. Zavala Giler, Osvaldo

☐ Counsel Support Section

☐ Victims and Witnesses Unit

☐ Detention Section

☐ Victims Participation and  
Reparations Section

☐ Other

## I. INTRODUCTION

1. The Defence for Patrice-Edouard Ngaïssona ('Ngaïssona Defence') hereby joins the "Yekatom Defence Request for an Extension of Page Limit" ('Yekatom Request'), filed by the Defence for Mr Yekatom ('Yekatom Defence') on 24 October 2025.<sup>1</sup>

## II. APPLICABLE LAW

2. Regulation 37(2) of the Regulations of the Court ('RoC') stipulates that "[t]he Chamber may, at the request of a participant, extend the page limit in exceptional circumstances".
3. Regulation 58(3) of the RoC sets the page limit for the appeal brief to a maximum of 100 pages.

## III. SUBMISSIONS

4. Exceptional circumstances exist warranting an extension of the applicable page limit, pursuant to Regulation 37(2) of the RoC. As set out in the Yekatom Request, factors such as the unprecedented length and complexity of the Judgment; the voluminous evidentiary record and multiple convictions; the need to address multiple complex legal and factual issues in the anticipated Appeal Brief; and the structural deficiencies in the Judgment requiring comprehensive analysis to demonstrate errors collectively establish the requisite exceptional circumstances. The Ngaïssona Defence fully concurs and adopts the reasoning set forth in the Yekatom Request.<sup>2</sup>
5. As co-appellant in the present case, the Ngaïssona Defence faces precisely the same exceptional circumstances as articulated in the Yekatom Request.
6. In addition, the Ngaïssona Defence submits that several, specific factors further justify the requested extension. *First*, Mr Ngaïssona has been convicted on 28

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<sup>1</sup> ICC-01/14-01/18-2829.

<sup>2</sup> ICC-01/14-01/18-2829, paras 2-6.

counts of war crimes and crimes against humanity, which directly impacts the breadth and complexity of the issues to be addressed on appeal.

7. *Second*, the anticipated Ngaïssona Defence Appeal Brief requires the development of complex and detailed submissions addressing both factual and legal issues that are central to the Judgment, some of which will be addressed in detail for the first time before this Court.<sup>3</sup> Moreover, as detailed in the Ngaïssona Defence Notice of Appeal, the Appeal Brief involves certain fair trial rights issues,<sup>4</sup> which the Appeals Chamber has previously recognised as contributing to the complexity of an appeal.<sup>5</sup>
8. *Finally*, the Ngaïssona Defence is appealing both the conviction and the sentence in a single brief and concurs with the Yekatom Defence that this simultaneous briefing increases the complexity of the appeal and necessitates additional space to ensure coherent and comprehensive treatment of all grounds.<sup>6</sup>
9. Accordingly, the Ngaïssona Defence respectfully requests that it be granted the same extension of pages as may be accorded to the Yekatom Defence.<sup>7</sup>

#### IV. RELIEF SOUGHT

10. The Ngaïssona Defence respectfully request the Appeals Chamber to:

- **GRANT** the Yekatom Request; and
- **GRANT** the same extension of pages to the Ngaïssona Defence.

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<sup>3</sup> ICC-01/04-01/18-2819-Conf, para. 19; ICC-01/04-01/18-2790, paras 18-21.

<sup>4</sup> ICC-01/04-01/18-2815, paras 30-33; ICC-01/04-01/18-2819-Conf, para. 21; ICC-01/04-01/18-2790, paras 22-23.

<sup>5</sup> *The Prosecutor v. Bosco Ntaganda*, Decision on Mr Ntaganda's request for an extension of the page and time limit for the filing of the appeal brief and related matters, ICC-01/04-02/06-2415, 20 September 2019, para. 12 citing *The Prosecutor v. Bosco Ntaganda*, Request for extension of page limit and time to file appeal brief, ICC-01/04-02/06-2398, 11 September 2019, para. 15. *See also The Prosecutor v. Jean-Pierre Bemba Gombo*, Decision on Mr Bemba's request for an extension of time for the filing of his document in support of the appeal, ICC-01/05-01/08-3370, 15 April 2016, para. 6.

<sup>6</sup> ICC-01/04-01/18-2829, para. 7 and fn. 15.

<sup>7</sup> *The Prosecutor v. Jean-Pierre Bemba Gombo, Aimé Kilolo Musamba, Jean-Jacques Mangenda Kabongo, Fidèle Babala Wandu and Narcisse Arido*, Decision on Mr Babala's request for an extension of page limit for his document in support of the appeal, ICC-01/05-01/13-2124, 23 March 2017, para. 9.

Respectfully submitted



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G.J. Alexander Knoops  
on behalf of  
Patrice-Edouard Ngaïssona

Dated this 27 October 2025

At The Hague, the Netherlands