



Original: English

No.: ICC-01/05-01/13

Date: 25/06/2014

PRE-TRIAL CHAMBER II

Before: Judge Cuno Tarfusser, Single Judge

SITUATION IN THE CENTRAL AFRICAN REPUBLIC

***IN THE CASE OF THE PROSECUTOR v. JEAN-PIERRE BEMBA GOMBO,
AIMÉ KILOLO MUSAMBA, JEAN-JACQUES MANGENDA KABONGO,
FIDÈLE BABALA WANDU and NARCISSE ARIDO***

Public Document

Defence response to Prosecution filing ICC-01/05-01/13-513

Source: Defence for Jean-Pierre Bemba Gombo

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

The Office of the Prosecutor

Fatou Bensouda

James Stewart

Kweku Vanderpuye

Counsel for Jean-Pierre Bemba Gombo

Nicholas Kaufman

Counsel for Aimé Kilolo Musamba

Ghislain Mabanga

Counsel for Jean-Jacques Mangenda Kabongo

Jean Flamme

Counsel for Fidèle Babala Wandu

Jean-Pierre Kilenda Kakengi Basila

Counsel for Narcisse Arido

Góran Kimo Sluiter

Legal Representatives of the Victims	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

Registrar

Herman von Hebel

Counsel Support Section

Victims and Witnesses Unit

Detention Section

The Defence for Jean-Pierre Bemba Gombo ("the Suspect") hereby responds to the *Prosecution's Application for Redactions pursuant to Rules 81(2) and 81(4) of the Rules of Procedure and Evidence*.¹

Submission

1. The Suspect objects to the redactions presently sought by the Prosecutor.
2. The Prosecutor openly admits that she has taken full advantage of the delay in the proceedings in order to attempt to bolster her case; the witness with respect to whom she seeks redactions was recently "re-interviewed".² The Single Judge, however, is reminded that the "new schedule" imposed was permitted purely for the purpose of receiving the third report from the Independent Counsel.
3. The Suspect reminds the Single Judge of those directives he gave at the status conference held on 4 December 2013.³ To permit the Prosecution, at this late date, to continue to embellish or apply "*mua langi*"⁴ to its case for confirmation, even with the most sincere intentions, would defeat the purpose of setting any deadlines at all.
4. The Single Judge is respectfully requested to reject the Prosecution request.



Nicholas Kaufman

Counsel for Jean-Pierre Bemba Gombo

Jerusalem, Israel
Wednesday, June 25, 2014

¹ ICC-01/05-01/13-513.

² Ibid at para. 1.

³ ICC-01/05-01/13-T-2-Red-ENG WT 04-12-2013 32/33.

⁴ ICC-01/05-01/13-421-Conf-Anx 26-05-2014 128/130.