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No.: **ICC-02/11-02/11**

Date: **28/08/2014**

PRE-TRIAL CHAMBER I

Before: Judge Silvia Fernández de Gurmendi, Presiding Judge

SITUATION IN THE REPUBLIC OF CÔTE D'IVOIRE

IN THE CASE OF THE PROSECUTOR v. CHARLES BLÉ GOUDÉ

Public Document

Defence request for a variation of a time limit

Source: Defence for Charles Blé Goudé

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

The Office of the Prosecutor

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Legal Representatives of the Victims

Legal Representatives of the Applicants

Unrepresented Victims

**Unrepresented Applicants
(Participation/Reparation)**

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Victims and Witnesses Unit

Detention Section

**Victims Participation and Reparations
Section Other**

Pursuant to Regulation 35(2) of the Regulations of the Court, Charles Blé Goudé ("the Suspect") hereby requests that the Single Judge extend the time limit for the submission of his list of evidence.

Submission

1. On 4 July 2014, the Prosecutor sought an extension of the time limit for filing the document containing the charges ("DCC") and her list of evidence ("LoE") in order to present her evidence "*as comprehensively and accurately as possible*".¹

2. On 11 July 2014, the Single Judge acceded to the Prosecutor's request and postponed the confirmation hearing from 18 August 2014 to 22 September 2014. In so doing, the Single Judge ordered the Prosecutor to file her DCC and LoE on 22 August 2014. Likewise, the Single Judge ordered the Defence to file its LoE by 5 September 2014.²

3. On 22 August 2014, quite literally at the eleventh hour, the Prosecutor filed her DCC and LoE.³

4. The Defence is currently investigating various issues arising out of the DCC including both the so-called "fifth incident" and the allegations made in Part 3 of the DCC entitled "*Contexte ayant mené à la conception et mise en oeuvre du plan commun*". These issues and the allegations arising therefrom are hotly contested by the Defence.

5. The DCC contains 240 pages and approximately 1200 footnotes. Many of these footnotes cites to numerous references in the Prosecutor's evidence collection.

6. In light of the sheer amount of material with which the Defence has been provided and the need to conduct an effective investigation to counter the new allegations contained therein, "good cause" is shown for a modest variation of the time limit for filing the Defence list of evidence.

¹ ICC-02/11-02/11-100.

² ICC-02/11-02/11-108.

³ ICC-02/11-02/11-124.

Relief Sought

7. In light of all the aforementioned, the Defence respectfully requests that the Single Judge permit the Defence to submit its list of evidence and disclose the contents thereof by Friday 12 September 2014.



Nicholas Kaufman
Counsel for Charles Blé Goudé

Done in Jerusalem, Israel
Thursday, August 28, 2014