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TRIAL CHAMBER IX

Before: Judge Bertram Schmitt, Presiding Judge
Judge Péter Kovács
Judge Raul Cano Pangalangan

SITUATION IN UGANDA

**IN THE CASE OF
*THE PROSECUTOR v. DOMINIC ONGWEN***

Public Document

**CLRV Response to “Defence Request for Leave to Appeal the Decision on
Defence Request for Medical Examination of Mr. Ongwen”**

Source: Office of Public Counsel for Victims

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

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I. INTRODUCTION

1. The Common Legal Representative of the Victims¹ (the “CLRV”) submits that the “Defence Request for Leave to Appeal the Decision on Defence Request for Medical Examination of Mr. Ongwen” (the “Request”)² should be rejected because it fails to meet the specific requirements of leave to appeal pursuant to article 82(l)(d) of the Rome Statute (the “Statute”).

2. In particular, the CLRV posits that the first purported issue does not arise from the “Decision on Defence Request for Medical Examination of Mr. Ongwen” (the “Impugned Decision”)³ since the statement challenged by the Defence is an *obiter dictum* in its nature, not an actual ruling of Trial Chamber IX (the “Chamber”) on the matter at stake. The second purported issue also fails to arise from the Impugned Decision because the Chamber did specifically assess the Accused’s ability to decide whether to testify and actually testify in his own defence, along with his overall capacity to stand trial. In fact, the Defence does not question the correctness of the Chamber’s assessment of the relevant facts. Neither does it show that the Chamber would have reached a substantially different conclusion, had it assessed said ability in isolation. As for the third purported issue, the Defence further fails to raise a proper appealable issue since it now alleges for the first time a specific legal issue never litigated before the Chamber and thus not forming any part of the actual ruling.

¹ See the “Decision on contested victims’ applications for participation, legal representation of victims and their procedural rights” (Pre-Trial Chamber II, Single Judge), No. [ICC-02/04-01/15-350](#), 27 November 2015, p. 19; the “Decision on issues concerning victims’ participation” (Pre-Trial Chamber II, Single Judge), No. [ICC-02/04-01/15-369](#), 15 December 2015, pp. 10-11; the “Second decision on contested victims’ applications for participation and legal representation of victims” (Pre-Trial Chamber II, Single Judge), No. [ICC-02/04-01/05-384](#), 24 December 2015, pp. 20-22; and the “Decision on the ‘Request for a determination concerning legal aid’ submitted by the legal representatives of victims” (Trial Chamber IX, Single Judge), No. [ICC-02/04-01/15-445](#), 26 May 2016, para. 13.

² See the Defence Request for Leave to Appeal the Decision on Defence Request for Medical Examination of Mr. Ongwen, No. [ICC-02/04-01/15-1626](#), 07 October 2019 (the “Request”).

³ See the “Decision on Further Defence Request for a Medical Examination” (Trial Chamber IX), No. ICC-02/04-01/15-1622, 01 October 2019 (the “Impugned Decision”).

II. PROCEDURAL BACKGROUND

3. On 5 December 2016, the day before the commencement of the trial, the Defence filed a request for a stay of proceedings and, pursuant to rule 135 of the Rules of Procedure and Evidence (the “Rules”), medical examination of the Accused.⁴ On 6 December 2016, the Prosecution⁵ and the CLRV⁶ opposed said request. On 6 December 2016, at the opening of the trial, the Chamber rendered an oral decision, finding that Mr Ongwen understands the nature of the charges brought against him.⁷

4. On 16 December 2016, the Chamber issued its “*Decision on the Defence Request to Order a Medical Examination of Dominic Ongwen*” and found, *inter alia*, that the Accused is fit to stand trial and thus a medical examination under rule 135 of the Rules was unwarranted.⁸ On 10 January 2019, as instructed by the Chamber,⁹ the Defence filed another request for a stay of the proceedings and order for a medical examination of Mr Ongwen.¹⁰ On 11 January 2019, the CLRV,¹¹ the Legal

⁴ See the “Defence Request for a Stay of the Proceedings and Examinations Pursuant to Rule 135 of the Rules of Procedure and Evidence”, Confidential with Public Annex A and Confidential Annex B, No. ICC-02/04-01/15-620-Conf, 5 December 2016. A public redacted version of the document was filed on the same day; see No. [ICC-02/04-01/15-620-Red](#).

⁵ See the “Prosecution’s Response to the Defence Request for a Stay of Proceedings”, No. ICC-02/04-01/15-624-Conf, 5 December 2016.

⁶ See the email from the CLRV sent on 6 December 2016 at 09:00.

⁷ See the Transcripts of the hearing held on 6 December 2016, No. [ICC-02/04-01/15-T-26-ENG CT WT](#), p. 3, line 5 to p. 7, line 12; and p. 17, line 11 to p. 19 line 15.

⁸ See the “Decision on the Defence Request to Order a Medical Examination of Dominic Ongwen” (Trial Chamber IX), No. ICC-02/04-01/15-637-Conf, 16 December 2016, para. 28. A public redacted version of the decision was filed on the same day; see No. [ICC-02/04-01/15-637-Red](#).

⁹ See the email sent by the Chamber on 9 January 2019 at 17:45. See also the email sent by the Defence on 9 January 2019 at 16:56.

¹⁰ See the “Confidential Redacted Version of “Defence Request for a Stay of the Proceedings and for Trial Chamber IX, pursuant to Rule 135 of the Rules of Procedure and Evidence, to Order a Medical Examination of Mr Ongwen”, filed on 10 January 2019, No. ICC-02/04-01/15-1405-Conf-Red, 10 January 2019.

¹¹ See the “CLRV Response to ‘Defence Request for a Stay of the Proceedings and for Trial Chamber IX, pursuant to Rule 135 of the Rules of Procedure and Evidence, to Order a Medical Examination of Mr Ongwen’”, No. ICC-02/04-01/15-1408-Conf, 11 January 2019. A public redacted version of the document was filed on 21 March 2019; see No. [ICC-02/04-01/15-1406-Red](#).

Representative of the Victims¹² and the Prosecution¹³ submitted their responses. On 16 January 2019, the Chamber issued its decision rejecting said request.¹⁴

5. On 16 September 2019, the Defence filed an urgent request to order a medical examination of Mr. Ongwen (the “Initial Request”).¹⁵ On 23 September 2019, the CLRV¹⁶, the Prosecution¹⁷ and Legal Representatives of Victims¹⁸ filed their responses. On 1 October 2019, the Chamber issued the Impugned Decision.¹⁹ On 7 October 2019, the Defence filed the Request.²⁰

III. SUBMISSIONS

6. Article 82(l)(d) of the Statute sets out the criteria for granting a request for leave to appeal as follows: (a) the decision shall involve an issue that would significantly affect: (i) the fair and expeditious conduct of the proceedings; or (ii) the outcome of the trial; and (b) for which, in the opinion of the relevant Chamber, an

¹² See the “Victims’ Response to ‘Confidential Redacted Version of ‘Defence Request for a Stay of the Proceedings and for Trial Chamber IX, pursuant to Rule 135 of the Rules of Procedure and Evidence, to Order a Medical Examination of Mr Ongwen’, filed on 10 January 2019’”, No. ICC-02/04-01/15-1409-Conf, 11 January 2019. A public redacted version of the document was filed on 12 June 2019; see No. [ICC-02/04-01/15-1409-Red](#).

¹³ See the “Prosecution Response to the ‘Defence Request for a Stay of the Proceedings and for Trial Chamber IX, pursuant to Rule 135 of the Rules of Procedure and Evidence, to Order a Medical Examination of Mr Ongwen’”, No. ICC-02/04-01/15-1410-Conf, 11 January 2019. A public redacted version of the document was filed on 22 January 2019; see No. [ICC-02/04-01/15-1410-Red](#).

¹⁴ See the “Decision on Defence Request to Order an Adjournment and a Medical Examination” (Trial Chamber IX), No. ICC-02/04-01/15-1412-Conf, 16 January 2019. A public redacted version of the decision was filed on the same day; see No. [ICC-02/04-01/15-1412-Red](#).

¹⁵ See the “Defence Urgent Request to Order a Medical Examination of Mr. Ongwen”, No. ICC-02/04-01/15-1595-Conf, 16 September 2019. A public redacted version of the document was filed on 03 October 2019; see No. [ICC-02/04-01/15-1595-Red](#) (the “Initial Request”).

¹⁶ See the “CLRV Response to ‘Defence Urgent Request to Order a Medical Examination of Mr. Ongwen’”, No. ICC-02/04-01/15-1604-Conf, 23 September 2019. A public redacted version of the document was filed on 07 October 2019; see No. [ICC-02/04-01/15-1604-Red](#).

¹⁷ See the “Prosecution’s Response to the ‘Defence Urgent Request to Order a Medical Examination of Mr. Ongwen’”, No. ICC-02/04-01/15-1606-Conf, 23 September 2019. A public redacted version of the document was filed on 02 October 2019; see No. [ICC-02/04-01/15-1606-Red](#).

¹⁸ See the “Victims’ response to the ‘Defence Urgent Request to Order a Medical Examination of Mr. Ongwen’”, No. ICC-02/04-01/15-1607-Conf, 23 September 2019. A public redacted version of the document was filed on 04 October 2019; see No. [ICC-02/04-01/15-1607-Red](#).

¹⁹ See the Impugned Decision, *supra* note 3.

²⁰ See the Request, *supra* note 2.

immediate resolution by the Appeals Chamber may materially advance the proceedings. For the purposes of the first prong of this test, the Appeals Chamber defined an “issue” as *“an identifiable subject or topic requiring a decision for its resolution, not merely a question over which there is disagreement or conflicting opinion”*.²¹ Moreover, the Appeals Chamber ruled that *“the Pre-Trial or Trial Chamber is vested with power to state, or more accurately still, to certify the existence of an appealable issue”*.²²

7. Consequently, it must first be determined whether the purported “issue” identified in the Request is an “appealable issue” within the meaning of article 82(1)(d) of the Statute, as interpreted by the jurisprudence of the Court. Indeed, *“while an application for leave to appeal should not contain in detail the arguments which the party intends to raise before the Appeals Chamber, it must still identify clearly the appealable issue, including by way of indicating a specific factual and/or legal error. Only in this case can the Chamber assess whether the issue, provided it was wrongly decided, may have implications on the fairness and expeditiousness of the proceedings or outcome of the trial”*.²³

8. The Defence seeks leave to appeal the following issues: (a) **Issue 1**- *Whether the Chamber’s consideration of lateness with respect to the accused’s testimony is consistent with its obligations under articles 21(3) and 64(2) of the Statute and with the accused’s fundamental fair trial right to testify*; (b) **Issue 2** - *Whether the Chamber is required, when determining if an accused is fit to stand trial under its article 64(2) obligations, to assess the meaningful exercise of all fair trial rights in a holistic manner, or the assessment can be based on an individual fair trial right, which forms the subject of separate orders of a medical examination*; and (c) **Issue 3** - *Whether the Decision discriminates against Mr. Ongwen, based on his documented mental health conditions and disabilities, by rejecting the*

²¹ See the “Judgement on the Prosecutor’s Application for Extraordinary Review of Pre-Trial Chamber I’s 31 March 2006 Decision Denying Leave to Appeal” (Appeals Chamber), No. [ICC-01/04-168](#) OA3, 13 July 2006, para. 9.

²² *Idem*, para. 20.

²³ See the “Decision on three applications for leave to appeal” (Pre-Trial Chamber I), No. [ICC-02/11-01/11-307](#), 30 November 2012, para. 70.

*appointment of an impartial mental health expert to assess his ability to make an informed decision whether or not to testify on his own behalf.*²⁴

9. As for **Issue 1**, the Defence argues that the Impugned Decision is inconsistent with the Chamber's obligations under articles 21(3), 64(2) and 67(1)(e) of the Statute in stating that the Prosecution was correct in arguing that the Initial Request should be rejected *in limine* for untimeliness and that Mr. Ongwen may be exceptionally allowed to testify in his defence.²⁵ The Defence adds that the Chamber's consideration of lateness with respect to the Accused's final decision on whether to testify disregards his fair trial rights.²⁶

10. The CLRV submits that this purported issue does not arise from the Impugned Decision. While the Chamber did consider *as a preliminary matter* the Prosecution's argument on timeliness, it further reasoned that this does not automatically preclude the Defence from raising the matter and it is "*indeed still possible for the Defence to file a request that the accused be, exceptionally, allowed to testify in his defence.*"²⁷ Accordingly, the Chamber addressed the substance of the Initial Request.²⁸

11. Therefore, the CLRV argues that the part of the Impugned Decision referring to the above mentioned Prosecution's argument was an *obiter dictum* since said statement²⁹ was not essential or even relevant to the Chamber's determination of the matter in question.³⁰ It is especially true because the Chamber *did not* dismiss *in limine*

²⁴ See the Request, *supra* note 2, pp. 3, 4 and 7.

²⁵ *Idem*, para. 6.

²⁶ *Ibidem*, para. 7.

²⁷ See the Impugned Decision, *supra* note 3, para. 12.

²⁸ *Idem*.

²⁹ See the Judgment on the appeal of Mr Laurent Koudou Gbagbo against the decision of Pre-Trial Chamber I on jurisdiction and stay of the proceedings (Appeals Chamber), No. [ICC-02/11-01/11-321](#) OA2 12 December 2012, para. 92.

³⁰ See the "Judgment on the appeal of Mr Laurent Gbagbo against the decision of Trial Chamber I entitled 'Decision giving notice pursuant to Regulation 55(2) of the Regulations of the Court'" (Appeals Chamber), No. [ICC-02/11-01/15-369](#) OA7, 18 December 2015, para. 72.

the Initial Request due to its alleged untimeliness - as advocated by the Prosecution, but *did consider* the merits of all the Defence's arguments.³¹ Thus, the actual ruling of the Chamber is determinative³² in this regard, not the *obiter dictum* statement, now challenged by the Defence.

12. The CLRV further argues that said issue cannot possibly significantly affect the fair and expeditious conduct of the proceedings or the outcome of the trial since the Chamber did in fact address the substance of the Initial Request. Moreover, aside from expressing a disagreement with the Impugned Decision, the Defence does not identify any concrete and specific prejudice for the Accused as a result of the Chamber's *obiter dictum*.³³ Additionally, even if granted leave, immediate resolution of this purported issue by the Appeals Chamber will not materially advance the proceedings. Indeed, it shall be inappropriate for the Appeals Chamber to pronounce itself on an *obiter dictum* since doing so would be tantamount to rendering an advisory opinion on issues that are not properly before it.³⁴

13. As for **Issue 2**, the Defence argues that the right of an Accused to make an informed decision as to whether or not to testify is a fundamental one which, while being related to other fair trial rights, must be analysed alone.³⁵ The Defence adds that it was erroneous for the Chamber to assess the Initial Request and the facts presented therein for the purpose of determining their impact on *all* of Mr. Ongwen's

³¹ See the "Judgment on the Appeal of Mr. Germain Katanga against the Oral Decision of Trial Chamber II of 12 June 2009 on the Admissibility of the Case" (Appeals Chamber), No. [ICC-01/04-01/07-1497](#) OA8, 25 September 2009, para. 38.

³² See the "Decision on Request for Leave to Appeal 'Decision on Bemba and Arido Defence Requests to Declare Certain Materials Inadmissible'" (Trial Chamber VII), No. [ICC-01/05-01/13-1489](#), 20 November 2015, para. 8.

³³ See the "Decision on request for leave to appeal the Decision concerning the Prosecutor's submission of documentary evidence on 13 June, 14 July, 7 September and 19 September 2016" (Trial Chamber I), No. [ICC-02/11-01/15-901](#), 04 May 2017, para. 14.

³⁴ See the "Judgment on the Appeal of Mr. Germain Katanga against the Oral Decision of Trial Chamber II of 12 June 2009 on the Admissibility of the Case", *supra* note 31, para. 38.

³⁵ See the Request, *supra* note 2, para. 9.

capacities necessary for the meaningful exercise of his fair trial rights, not solely on his capacity to make an informed decision whether to testify or not.³⁶

14. The CLRV submits that this purported issue also fails to arise from the Impugned Decision. First of all, the Defence admits the fact that said right is related with his other fair trial rights.³⁷ Hence, the Chamber found in the Impugned Decision that:

“It has been previously held that a chamber must take into account ‘all the relevant circumstances of each individual case’ when deciding if an accused is fit to stand trial. This means that the meaningful exercise of one’s procedural rights cannot be split up separately in individual, compartmentalised rights, which form subject of completely separated orders of a medical examination. This becomes also apparent from the Request which relies on jurisprudence on the fitness to stand trial in general and not an distinct jurisprudence examining whether the accused can make a decision to testify or not. The purpose of the Request is to order an examination for the purpose to determine whether Mr Ongwen has any conditions which would ultimately preclude him from exercising his procedural rights, focusing on one such right in particular.”³⁸

15. Subsequently, the Chamber proceeded to assess whether there are indications suggesting the existence of medical conditions which might impact on the Accused’s ability to meaningfully exercise his fair trial rights.³⁹ In light of the Initial Request, the Chamber took into account the particular issue of the Accused’s ability to decide whether to testify; and assessed, based on the available information before it, whether he is able to take said decision.⁴⁰ In particular, the Chamber’s conclusion in the Impugned Decision was supported by a psychiatric examination from December 2016 and a report sent by the Court’s detention centre’s medical officer in February 2019, as referred in the Initial Request.⁴¹ Furthermore, the Chamber examined the

³⁶ *Idem*, para. 11.

³⁷ *Ibidem*, para. 9.

³⁸ See the Impugned Decision, *supra* note 3, para. 15.

³⁹ *Idem*, para. 16.

⁴⁰ *Ibidem*, paras. 20,

⁴¹ See the Initial Request, *supra* note 15, paras. 18-21 and 22-23. See also the Impugned Decision, *supra* note 3, paras. 21 and 24.

report of the expert witnesses called by the Defence in relation to Mr Ongwen's capacity to decide whether to testify and actually testify in his own defence.⁴²

16. Consequently, the CLRV argues that, while addressing his overall capacity to stand trial, the Chamber did also specifically assess the Accused's ability to decide whether to testify and actually testify in his own defence. *Arguendo*, even if the Chamber had assessed said ability in a standalone fashion or in isolation from the other capacities, as advocated by the Defence, there is no showing that it would have reached a substantially different conclusion. Indeed, the Defence does not argue that the Chamber's assessment was factually incorrect or unreasonably wrong. Furthermore, the Defence fails to identify any concrete and specific prejudice for the Accused as a result of the Chamber's approach in evaluating all the relevant circumstances. Thus, there is no specific subject or topic requiring resolution by the Appeals Chamber within the meaning of article 82(l)(d) of the Statute.

17. Even if it is deemed that Issue 2 does arise from the Impugned Decision, the CLRV posits that said issue cannot possibly significantly affect the fair and expeditious conduct of the proceedings or the outcome of the trial since the Chamber did in fact assess the Accused's ability to decide whether to testify and actually testify in his own defence, as requested by the Defence. Additionally, even if granted leave, immediate resolution of this purported issue by the Appeals Chamber will not materially advance the proceedings. As explicitly stated in the Impugned Decision, the Chamber took into account the particular issue of the Accused's ability to testify, especially due to the Initial Request.⁴³ The Defence fails to demonstrate that the Chamber's assessment was factually erroneous or that the Chamber would have made a completely different decision, had it assessed said ability separately from the others. Therefore, the Appeals Chamber will not be able to review the Chamber's factual findings since (regardless of the approach taken in the Impugned Decision)

⁴² See the Impugned Decision, *supra* note 3, para. 27.

⁴³ *Idem*, para. 16.

the outcome of the evaluation of Mr Ongwen's capacities will have been the same. This will subvert the corrective nature of the Appeals Chamber's mandate.⁴⁴

18. As for **Issue 3**, the Defence argues that the Chamber's analysis and conclusions are discriminatory since it addressed the matter as if Mr Ongwen was not a mentally disabled defendant.⁴⁵ The Defence adds that the Chamber was required to apply available standards on equal and meaningful participation in the proceedings by defendants with mental disabilities and take necessary precautions, such as the medical examination under articles 21(3) and 64(2) of the Statute and rule 135 of the Rules.⁴⁶

19. The CLRV submits that this is the first time that the Defence qualifies Mr Ongwen as a mentally disabled person. Nowhere in the Initial Request did the Defence argue the same. While the Defence did raise the possibility that Mr Ongwen suffers from certain mental vulnerability, disorder or condition in its Initial Request⁴⁷, this is of course not the same as considering him as a mentally disabled person. Disability is a specific medical terminology that has far reaching legal consequences in criminal proceedings.⁴⁸ Yet, since the Defence did not formally make any arguments, or present facts, demonstrating that the Accused is actually a mentally disabled person, the Chamber was not in the position and/or under any obligation to make any legal or factual finding to that effect. Indeed, no expert conclusively found that Mr Ongwen is mentally disabled, so far.

20. Therefore, this purported issue does not arise from the Impugned Decision. As held by the Appeals Chamber, a properly constituted appealable issue must first and

⁴⁴ See the "Judgment on the appeal of the Prosecutor against the decision of Trial Chamber IV of 12 September 2011 entitled 'Reasons for the Order on translation of witness statements (ICC-02/05-03/09-199) and additional instructions on translation'" (Appeals Chamber), No. [ICC-02/05-03/09-295](#) OA2, 17 February 2012, para. 20.

⁴⁵ See the Request, *supra* note 2, paras. 19 and 20.

⁴⁶ *Idem*, para. 25.

⁴⁷ *Ibidem*, paras. 19, 22 and 27.

⁴⁸ See for example Rule 102 of the Rules and Regulation 103 of the Regulations of the Court.

foremost arise from the Impugned Decision.⁴⁹ In other words, the issue identified by the appellant must be a specific issue which has been dealt in⁵⁰ or must emanate from the Impugned Decision.⁵¹ The allegation that Mr Ongwen is a mentally disabled person was never litigated by the Defence in its Initial Request. Nor did the Chamber assess the Accused's abilities to exercise his fair trial rights against, if any, legal or medical standards applicable to a mentally disabled defendant. As a result, this purported issue fails to constitute a proper appealable issue.

21. Even if the Chamber considers otherwise, this purported issue cannot possibly significantly affect the fair and expeditious conduct of proceedings or the outcome of the trial since *no* legal or medical standards defining or dealing with a mentally disabled person and correlated factual findings formed part of the Impugned Decision. *Arguendo*, even if leave is granted, an appeal is conducted before the Appeals Chamber with the specific purpose of reviewing the proceedings that took place before a lower Chamber.⁵² Yet, as mentioned *supra*, the Chamber did not make any legal or factual findings in relation to said mental disability from which the Accused allegedly suffers. Moreover, even if the Appeals Chamber was to address this matter, it would then be reviewing such issues for the first time on appeal, akin to a first instance court, which is against its corrective function.⁵³ Consequently, the immediate resolution of the third purported issue by the Appeals Chamber will not

⁴⁹ See the "Judgment on the Prosecutor's Application for Extraordinary Review of Pre-Trial Chamber I's 31 March 2006 Decision Denying Leave to Appeal", *supra* note 21, para. 9.

⁵⁰ See the "Decision on the 'Defence Application for Leave to Appeal the 'Decision on the defence request for a temporary stay of proceedings'" (Trial Chamber IV), No. [ICC-02/05-03/09-428](#), 13 December 2012, para. 7.

⁵¹ See the "Decision on the Prosecutor's and Defence requests for leave to appeal the decision adjourning the hearing on the confirmation of charges" (Pre-Trial Chamber I), No. [ICC-02/11-01/11-464](#), 31 July 2013, para. 8; and the "Decision on the Defence Request for Leave to Appeal" (Pre-Trial Chamber II), No. [ICC-01/04-02/06-207](#), 13 January 2014, para. 11.

⁵² See the "Decision on the 'Filing of Updated Investigation Report by the Government of Kenya in the Appeal against the Pre-Trial Chamber's Decision on Admissibility'" (Appeals Chamber), No. [ICC-01/09-02/11-202](#) OA, 28 July 2011, para. 11.

⁵³ See the "Judgment on the appeal of the Prosecutor against the decision of Trial Chamber IV of 12 September 2011 entitled 'Reasons for the Order on translation of witness statements (ICC-02/05-03/09-199) and additional instructions on translation'", *supra* note 44, para. 20.

materially advance the proceedings as it will be engaging in an academic exercise in reviewing a ruling which is not contained in the Impugned Decision.

IV. CONCLUSION

22. For the foregoing reasons, the Common Legal Representative of the Victims respectfully requests the Chamber to reject the Request in its entirety because none of the issues identified by the Defence constitutes appealable issues; nor do they meet the stringent requirements for granting interlocutory appeal under article 82(1)(d) of the Rome Statute.

A handwritten signature in black ink, reading "Paolina Massidda", with a horizontal line underneath the name.

Paolina Massidda
Principal Counsel

Dated this 11th day of October 2019

At The Hague, The Netherlands