

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: **ICC-02/04-01/15**

Date: **5 May 2021**

APPEALS CHAMBER

Before:

**Judge Luz del Carmen Ibáñez Carranza, Presiding Judge
Judge Piotr Hofmański
Judge Solomy Balungi Bossa
Judge Reine Alapini-Gansou
Judge Gocha Lordkipanidze**

SITUATION IN UGANDA

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

PUBLIC

Defence request on behalf of Co-Counsel Lyons to include her name on the notification page of filings

Source: Defence for Dominic Ongwen

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

Fatou Bensouda, Prosecutor
 James Stewart, Deputy Prosecutor
 Helen Brady

Counsel for the Defence

Krispus Ayena Odongo
 Chief Charles Achaleke Taku
 Beth Lyons

Legal Representatives of the Victims

Joseph Akwenyu Manoda
 Francisco Cox

Common Legal Representative for Victims

Paolina Massidda
 Orchlon Narantsetseg
 Caroline Walter

Unrepresented Victims**Unrepresented Applicants
(Participation/Reparation)****The Office of Public Counsel for Victims**

Paolina Massidda

**The Office of Public Counsel for the
Defence**

Xavier-Jean Keïta

States' Representatives**Amicus Curiae****REGISTRY****Registrar**

Peter Lewis, Registrar

Counsel Support Section**Victims and Witnesses Unit****Detention Section****Victims Participation and Reparations
Section****Other**

I. INTRODUCTION

1. The Defence for Dominic Ongwen ('Defence') hereby respectfully requests the Appeals Chamber to include Ms Beth Lyons on the notification page of its decisions and orders as Ms Lyons has been appointed as a Co-Counsel for the Defence.
2. The Defence avers that including her name shows equality amongst those appointed through the Legal Aid Policy. Ms Lyons was appointed as Co-Counsel on the Defence, as per letter from CSS dated 1 June 2017.¹ The Defence was granted the funding to encompass two Co-Counsel positions due to number of charges and complexities of the Ongwen case.

II. SUBMISSIONS

3. Ms Lyons has served as Co-Counsel on the Defence since 1 June 2017. She is intimately familiar with the case, the Client and the issues currently being prepared for submission to the Appeals Chamber. Co-Counsel Lyons is an experienced trial and appellate attorney in both national and international jurisdictions, and has worked in international courts and tribunals since 2004.
4. Because of the complexity and size of the case for which Mr Ongwen was convicted and is now pending appeal, it warrants, like no other case prosecuted before an international court or tribunal, a second experienced co-counsel like Co-Counsel Lyons. Co-Counsel Lyons performs the same level of duties and has the same level of responsibilities attributed to the Defence's other co-counsel, Chief Charles Achaleke Taku. As such, the Defence respectfully requests that Co-Counsel Lyons name be added onto the notification page of decisions and orders.

III. RELIEF

5. For the abovementioned reasons, the Defence respectfully requests the Appeals Chamber to include the name of Co-Counsel Beth Lyons on the notification page of its decisions and orders.

Respectfully submitted,

¹ Letter from Counsel Support Section, CSS/2017/316. *See also* letter from Counsel Support Section, CSS/2021/215.



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Hon. Krispus Ayena Odongo
On behalf of Dominic Ongwen

Dated this 5th day of May, 2021
At The Hague, Netherlands