

**Cour
Pénale
Internationale**

**International
Criminal
Court**



Original: English

No.: ICC-02/04-01/15
Date: 14 January 2022

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

URGENT

Victims Response to the “Prosecution’s Urgent Request for an Extension of Pages”

Source: Legal Representatives of Victims

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

Mr Karim A. A. Khan, Prosecutor
Ms Helen Brady

Counsel for the Defence

Mr Krispus Ayena Odongo
Mr Charles Achaleke Taku
Ms Beth Lyons

Legal Representatives of the Victims

Mr Joseph Akwenyu Manoba
Mr Francisco Cox

The Office of Public Counsel for Victims

Ms Paolina Massidda

Amicus Curiae

Dr. Mohammad Hadi Zakerhossein;

Felicity Gerry QC, Wayne Jordash QC, Ben Douglas-Jones QC, Anna McNeil, Philippa Southwell, Dr. Beatrice Krebs and Jennifer Keene-McCann;

Erin Baines, Anne-Marie de Brouwer, Annie Bunting, Eefje de Volder, Kathleen M. Maloney, Melanie O'Brien, Osai Ojigho, Valerie Oosterveld, Indira Rosenthal;

Louise Arimatsu, Adejoké BabingtonAshaye, Kirsten Campbell, Danya Chaikel, Christine Chinkin; Carolyn Edgerton, Priya Gopalan; Gorana Mlinarević, Angela Mudukuti, Cynthia T. Tai;

Sareta Ashraph, Stephanie Barbour, Kirsten Campbell, Alexandra Lily Kather, Jocelyn Getgen Kestenbaum, Maxine Marcus, Gorana Mlinarević, Valerie Oosterveld, Kathleen Roberts, Susana SáCouto, Jelía Sané, Hyunah Yang;

Professor Jean Allain, Monash University, Castan Centre for Human Rights Law;

Dr. Rosemary Grey, Global Justice Center (GJC); Amnesty International (AI), Women's Initiatives for Gender Justice (WIGJ)

Association of Defence Counsel Practicing before the International Courts and Tribunals (ADC-ICT)

Dr. Ayodele Akenroye, Professor Erin Baines, Professor Kamari M. Clarke, Professor Mark A. Drumbl

Prof. Dr. Mario H. Braakman;

Mr. Arpit Batra;

NIMJ - National Institute of Military Justice

Tina Minkowitz, Robert D. Fleischner

Public International Law & Policy Group

Justice Francis M. Ssekandi

Dr. Paul Behrens, University of Edinburgh

REGISTRY

Registrar

Mr Peter Lewis

I. INTRODUCTION

1. The Legal Representatives for Victims (LRVs) hereby submit their response to the 'Prosecution's Urgent Request for Extension of Pages' (hereafter "Request").¹ The LRVs do not oppose the Request.

II. SUBMISSIONS

2. The LRVs concur with the Prosecution that a number of complex arguments have been raised by the various *amici*,² which would reasonably justify an extension of page limits in order to address the issues raised.
3. The LRVs consider the request of an additional 5 pages over the page limit set by the Appeal Chamber³ to be reasonable in the circumstances and agree that the extension, if granted, should be extended to the Parties and Participants.

III. RELIEF

4. The LRVs therefore support the Prosecution's request for extension of page limit to an additional five pages and request that a similar extension be granted to the Parties and Participants for their responses to the *amici curiae* submissions.

Respectfully submitted,



Joseph A. Manoba



Francisco Cox

Dated this 14th day of January 2022

At Kampala, Uganda and at Santiago, Chile

¹ Appeals Chamber, *Prosecution's Urgent Request for Extension of Pages*, 13 January 2022, ICC-02/04-01/15-1944.

² Ibid, para 4

³ Appeal Chamber, Decision on the requests for leave to file observations pursuant to rule 103 of the Rules of Procedure and Evidence, 24 November 2021, ICC-02/04-01/15-1914.