

**UNITED  
NATIONS**



International Residual Mechanism  
for Criminal Tribunals

Case No: MICT-15-96-A

Date: 22 September 2021

Original: English

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**IN THE APPEALS CHAMBER**

**Before:** Judge Carmel Agius  
Judge Lee G. Muthoga  
Judge Aminatta Lois Runeni N’gum  
Judge Yusuf Aksar  
Judge Claudia Hoefer

**Registrar:** Abubacarr Tambadou

**THE PROSECUTOR**

v.

**JOVICA STANIŠIĆ  
FRANKO SIMATOVIĆ**

**PUBLIC**

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**PROSECUTION RESPONSE TO STANIŠIĆ DEFENCE  
URGENT REQUEST TO EXPEDITE THE PROSECUTION  
RESPONSE AND FOR AN EXPEDITED DECISION**

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**The Office of the Prosecutor:**

Laurel Baig  
Barbara Goy

**Counsel for Jovica Stanišić:**

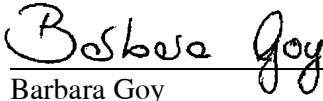
Wayne Jordash  
Joe Holmes

**Counsel for Franko Simatović:**

Mihajlo Bakrač  
Vladimir Petrović

1. Stanišić's Request<sup>1</sup> should be dismissed because Stanišić fails to justify any of the relief sought.
2. Stanišić's Original Motion<sup>2</sup> was not identified as "urgent" in the title. Nor does the Original Motion contain any request for expedited filing deadlines or decision-making. The only reference to urgency is found in paragraph 34 of the Original Motion, in relation to the relief sought.
3. Stanišić's Request—filed two days before the original deadline—seeking an order compelling the Prosecution to file its Response one day before the original deadline is moot, since the Prosecution filed its Response a day early. In any event, a single day does not expedite the proceedings in any meaningful way.
4. While it is open to Stanišić to file any reply within a day, he has failed to demonstrate why the Prosecution should have to file any possible amendment to its Notice with the same urgency. Expedited deadlines are not warranted simply because these appeal proceedings follow a retrial.<sup>3</sup>

Word count: 200

  
Barbara Goy  
Senior Appeals Counsel

Dated this 22<sup>nd</sup> day of September 2021  
At The Hague, The Netherlands

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<sup>1</sup> Stanišić Defence Urgent Request to Expedite the Prosecution Response and for an Expedited Decision, 21 September 2021 ("Request").

<sup>2</sup> Stanišić Defence Motion to Strike and/or Amend Prosecution Notice of Appeal, 13 September 2021 ("Original Motion").

<sup>3</sup> *Contra* Request, para.10.



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