

MICT-13-33  
13-08-2015  
(543 - 542)

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THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

CASE No. MICT-13-33

Before: Judge Vagn Joensen, Single Judge

Registrar: Mr. John Hocking

Date Filed: 13 August 2015

THE PROSECUTOR

v.

JEAN DE DIEU KAMUHANDA

*Public*

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APPLICATION FOR LEAVE TO REPLY:  
MOTION FOR APPOINTMENT OF  
AMICUS CURIAE PROSECUTOR

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Office of the Prosecutor:

Mr. Hassan Jallow

Mr. Richard Karegyesa

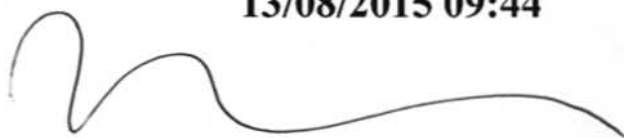
Ms. Sunkarie Ballah-Conteh

Jean de dieu Kamuhanda:

Mr. Peter Robinson, Counsel

**Received by the Registry**  
**Mechanism for International Criminal Tribunals**

**13/08/2015 09:44**



1. Jean de dieu Kamuhanda respectfully seeks leave to reply to the *Prosecution Response to Motion for Appointment of Amicus Curiae Prosecutor to Investigate Prosecution Witness GEK* pursuant to Rule 153.

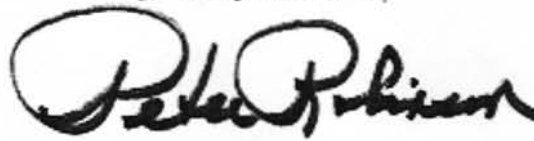
2. Mr. Kamuhanda believes that a reply brief can of assistance to the Single Judge in deciding the issues before him. The brief would respond to the prosecution's contention that the Single Judge is without jurisdiction to grant the requested relief,<sup>1</sup> and would discuss the jurisprudence that he contends supports jurisdiction of the Mechanism's Single Judge to appoint an amicus curiae prosecutor.<sup>2</sup>

3. The brief would also respond to submissions of the prosecution that the Appeals Chamber has already decided the matter,<sup>3</sup> and would point out information which was not in the possession of the Appeals Chamber when it issued its decisions.

4. Mr. Kamuhanda can file his reply within 48 hours of being notified that leave was granted.

Word count: 321

Respectfully submitted,



PETER ROBINSON  
Counsel for Jean de dieu Kamuhanda

<sup>1</sup> *Response* at para. 5

<sup>2</sup> *In Re Sebureze & Turinabo*, No. MICT-13-40-R90, *Decision on Deogratias Sebureze and Maximilien Turinabo's Motions on the Legal Effect of the Contempt Decision and Order Issued by the ICTR Trial Chamber* (20 February 2013) at para. 13; *Prosecutor v Karadzic*, No. IT-95-5/18-T, *Decision on Jurisdiction Following the Assignment of a Specially Appointed Chamber* (18 October 2013); *Prosecutor v Karadzic*, No. IT-95-5/18-T, *Decision on Accused's Motion for Appointment of Amicus Curiae Prosecutor to Investigate Officials of the United States of America* (16 January 2014)

<sup>3</sup> *Response* at paras. 6-7