

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

Case No. MICT-13-56-A

BEFORE THE APPEALS CHAMBER

Before the Honourable: Judge Theodor Meron, Presiding
Judge Carmel Agius
Judge Liu Daqun
Judge Prisca Matimba Nyambe
Judge Seymour Panton

Registrar: Mr. Olufemi Elias

Date Filed: 11 July 2018

THE PROSECUTOR

v.

RATKO MLADIĆ

Public Redacted with Public Redacted Annexes (B1, B2, B3) and Confidential Annex A

**DEFENCE RESPONSE TO SECOND REGISTRAR'S SUBMISSION IN
RELATION TO DEFENCE MOTIONS FOR RECONSIDERATION**

The Office of the Prosecutor:

Ms. Laurel Baig
Ms. Barbara Goy
Ms. Katrina Gustafson

Counsel for the Accused:

Mr. Branko Lukić
Mr. Dragan Ivetić

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS**THE PROSECUTOR**

v.

RATKO MLADIĆ**Public Redacted**

**DEFENCE RESPONSE TO SECOND REGISTRAR'S SUBMISSION IN
RELATION TO DEFENCE MOTIONS FOR RECONSIDERATION**

The Accused, Ratko Mladić, by and through his counsel of record, files the instant Response and in support thereof states:

I. Procedural Background

1. On 22 May 2018, the Defence filed its “Motion to Reconsider Decision on Renewed Motion for Contempt” (hereinafter: “*First Motion*”).¹
2. On 30 May 2018 the Prosecution filed their Response to the First Motion (hereinafter: “*OTP First Response*”).²
3. On 5 June 2018 the Defence filed their Reply as to the First Motion, addressing the OTP First Response. (hereinafter: “*First Reply*”).³
4. On 29 May 2018 the Defence filed its “Motion to Reconsider Decision on a Motion for Reconsideration and Certification to Appeal Decision on a Request for Provisional Release” (hereinafter: “*Second Motion*”).⁴

¹Public with Confidential Annexes

²Public with Confidential Annex

³Filed Publicly and Confidentially, with Annex A

5. On 31 May 2018 the Prosecution filed their Response to the Second Motion. (hereinafter: “*OTP Second Response*”)⁵
6. On 4 June 2018 the Defence filed their Reply to the OTP Second Response. (hereinafter “*Second Reply*”)⁶
7. On 8 June 2018 the Registrar has filed a Submission⁷ in relation to the First Motion and Second Motion, raising matters that were not part of either OTP Response and thus which require to be addressed. (hereinafter: “*1st Registrar Submission*”)⁸
8. The Defence filed a Response to the 1st Registrar Submission on 15 June 2018 and has now received on 28 June 2018 a Second Submission from the Registry addressing that Response (hereinafter: “*2nd Registrar Response*”) which repeats many points from the 1st Registrar Submission but expands on points. The instant Response is timely filed as of right to address the 2nd Registrar Submission. It is necessitated because the 2nd Registrar Submission mis-construes the full extent and nature of the Motion and the prevailing law and arguments that should be applied to the same. We will not address **all** the points of disagreement but do need to highlight some glaring mis-statements that demonstrate the Registrar Submission is made to try and obscure further the mis-deeds and conduct of its Staff at UNDU, while attempting to obstruct and stifle the Defence from making well-founded and good-faith claims.

II. Arguments and Submissions

A. The ICTY Trial Chamber order for filing of the medical reports does remain in force

9. The 2nd Registrar Submission claims that the ICTY Trial Chamber’s oral order for the ICTY Registry does not bind the Registry, insofar its jurisdiction ended upon completion

⁴Confidential with Confidential Annex

⁵Confidentially

⁶Confidentially

⁷Confidentially

⁸Confidentially

of the trial proceedings. For such position, Rule 86(F) of the Mechanism's RPE's is cited.⁹

10. Such position is incorrect for several reasons. First, it ignores that the court proceedings are not completed/final since appeal phase of the proceeding is ongoing. Therefore, any such oral measures issued by the Trial Chamber concerning health of the accused could only be devoid by the competent authority, and in this case that could only be Appeals Chamber, not the Registry.
11. Second, such position grossly ignores the Mechanism's own mandate and competencies, in particular as Article 2 of SC Resolution 1966: Establishment, Statute, and Transitional Arrangements (S/RES/1966 (2010)) which clearly states that *The Mechanism shall continue the functions of the ICTY and of the ICTR, as set out in the present Statute ("residual functions")*, during the period of its operation.
12. Therefore, cited rule 86(F) related to measures of protection of victims and witnesses in *different* cases is absolutely irrelevant, and as such does not affect the aforementioned order. Any different position is in direct violation to the fundamental rights of the Accused and in contravention to legal certainty.
13. Accordingly, the Registrar Submission presents an argument that is without merit.

B. The 2nd Registrar Submission presents an already adjudicated matter that should be stricken – the use of Dr. Falke's name in filings.

14. The 2nd Registrar Submission persists in its allegations of the Registrar Submission relating to the use of Dr. Falke's name in public filings.¹⁰ We stress yet again that we have not identified the names of other medical officers as alleged, unless IME's are considered UNDU medical officers, which would negate the entire position of the Registrar that they are "independent" and not part of the treating team. The Registrar's position fails to take into account that the Chief UNDU Medical Officer testified in open session giving

⁹ 2nd Registrar Response, para. 3, *see* footnote no. 5.

¹⁰ 2nd Registrar Response, para. 7

precise details as to the full names and position titles of **all** UNDU medical staff (RMO) in Open/Public session. Thus, the manner of addressing persons by their titles promoted by the Registrar is illogical and provides no masking of their identity, since the public record already has the Registrar’s own subordinate linking the names to the positions. A copy of one relevant part of the testimony of Dr. Falke is attached hereto as Confidential Annex A.

15. Accordingly, the Registrar Submission presents an argument that is without merit.

C. The Registrar Submission Confirms that the Defence Motions Accurately have stated that the Independent Medical Examiners are acting counter to the Ethical Standards in order to be considered “Independent”.

16. The 2nd Registrar Submission claims it is Defence allegation seeking to undermine the role of the Mechanism’s retained “Independent Medical Experts” (hereinafter: “IMEs”) and posits that they have not been part of the treating team at the UNDU medical Center nor had any therapeutic relationship with Movant or the treatment decided at the UNDU.¹¹ However, a review of the admissions of these “IMEs” not only do not support the Registrar but contradict him:

- i. “Doctors and Nurses [...] They also follow my recommendations regarding the adjustment of treatment regime and necessary test in his particular case.”¹²

17. As to the foregoing it is abundantly clear that the purported IMEs are taking part in the therapy and treatment plan of the patient, creating a conflict of interest, and if it is still maintained they are IMEs rather than treaters, it would be an explicit violation of several well-established medical ethics rules as to IMEs. The Registrar cannot contradict what his own IMEs have admitted in written filings presented to the Court.

¹¹2nd Registrar Submission para. 5

¹²See. E.g. “REGISTRY FURTHER SUBMISSION IN RELATION TO DEFENCE MOTION ON ACCESS TO MEDICAL OPINIONS” 17 November 2017 (Confidential), Annex A, pg 1 ([REDACTED])

D. The Registrar Submission mis-states the facts as to provision of Medical Records

18. The 2nd Registrar Submission again erroneously claims that medical documents were provided in accordance with Mr. Mladić's own wishes, and now changes (again) their position to claim that the 2 weeks from the "request" is actually 2 weeks from receipt and can be declined by the UNDU Commanding officer if repetitive with no reasonable justification.¹³
19. We have to stress, and your honors have the entirety of the communications with the UNDU Commanding Officer and Defence as an annex to our prior filings, that this position of the Registrar is made in error or is otherwise not made in good faith, insofar as the UNDU Commanding officer has **never** invoked a refusal to provide records as repetitive or without justification. The UNDU Commanding Officer has **never** claimed the information and documentation sought was not in the possession of the UNDU, in fact, his first email response makes clear that these records were produced by the UNDU at the UNDU rather than any outside hospital. Thus, the Registrar's current position is baffling, especially when one takes into account that the records pertain to a previously undisclosed medical diagnosis of arrhythmia, which according to Doctors is the single most frequent symptom/warning/indicator of sudden cardiac death in cardiac patients, per the MERIT-HF study widely recognized in the medical community (~90%). The Registrar has recently filed that these are "innocent" arrhythmia. Doctors have confirmed in the field of cardiac medicine there is NO such classification of arrhythmia. Extra systoles are the source of arrhythmia and must be investigated with 24-Hour Holter monitoring and treated, or if left untreated amount to medical negligence. It is shocking that the Registrar of the Mechanism supports such conduct and attempts to downplay such conduct by filings that present false facts that are rendered false by the plain reading of the communications in question. The Defence, upon advice of a doctor trained in the field, respectfully submits that the continued abstinence on the part of UNDU medical

¹³2nd Registrar Submission, para. 6

personnel to investigate and treat Mr. Mladic's Arrhythmia under the apparent protection of the Registrar, constitute a serious risk of death. This matter needs to be treated seriously rather than in the fashion undertaken to date by the UNDU.

20. Even a layperson can see from the Second Reply that was filed, and particularly Annex A of the same, which exhaustingly goes through ALL of the communications in writing between the UNDU and Defence wherein it is abundantly clear that Mr. Mladić immediately reported his ill health arising from the 23 April 2018 incident and requested, via his counsel access to documentation from the same. UNDU in essence presented obstacles and excuses to prevent the same, relying on the unwritten, oral hearsay representations of Dr. Falke to trump the explicit requests of Mr. Mladic, via counsel. To try and come up with a new "excuse" for this conduct, as the 2nd Registrar Submission attempts, is inappropriate to say the least.
21. That the Registrar would file their Submission, after this damning Second Reply, after our Response to the 1st Registrar Submission, trying to argue a factual situation that is clearly rendered false by the documentary record of written correspondence demands the action of the Appeals Chamber. It calls into question whether these claims of the Registrar Submission are made in good faith ignorance of these delays and obstruction on the part of the UNDU, or in an attempt of furtherance or cover-up of same.
22. Additionally, and finally, it is remarkable the lengths to which the UNDU and now apparently the Registrar will go to in order to smear the Defence counsel and misrepresent the truth to the Appeals Chamber. Footnote 17 of the 2nd Registrar Submission claims that Mr. Ivetić appeared "unannounced" at the UNDU 17 April 2018 and claims that a 3 November 2017 visit was mistaken by Mr. Ivetić to refer to 7 November 2017. All these assertions are patently false. Attached at Annex B1-3 hereto are the following:
 - a. The Email sent by Mr. Ivetić 16 April 2018 more than 24 hours in advance of the 17 April 2018 visit, requesting same. UNDU never responded. The visit was not "unannounced."

- b. The 3 total emails relating to the 3 November 2017 visit demonstrating a rather detailed (and amicable) exchange between Mr. Ivetić and UNDU staff discussing and setting the visit on 3 November 2017 to accommodate the UNDU's schedule and Mr. Ivetić's availability. The visit took place as per the agreement with no confusion.
 - c. The email exchange around the request sent 2 November 2017, 5 days prior to the 7 November 20017 visit¹⁴ and resent to the UNDU after it was complained that this visit too was "unannounced." As is clear UNDU is apologetic as to the mistake it made. Given the differing times and visitors there is no way for this visit to be confused with the 3 November 2017 visit detailed in (b) above.
23. Clearly, from the above, the only true statement by the Registrar in footnote 17 is the July 2017 visit mix-up already acknowledged by Mr. Ivetić and apologized for. Thus, there is no proof of any acrimonious approach of the Defence, rather only evidence that the Defence at all times acted appropriately and professionally with the UNDU staff as to visits, and that the Registrar is being reported erroneous information from UNDU to smear the reputation of the defence while at the same time cover-up their own errors. This is wholly unacceptable, all the more so since Mr. Ivetić gave the UNDU CO an opportunity to provide evidence of any dates claimed which the UNDU CO failed to do (as reflected in the email correspondences in the Second Reply). The existence of obstructionist behaviour at the UNDU aimed at Mr. Mladić and his counsel is now abundantly clear to all.

¹⁴The 2nd Registrar Submission claims a 7 November 2018 visit, which must be a typo as that is a date in the future.

III. Conclusion

24. Thus, the Defence reiterates the 2nd Registrar Submission has failed to address nor rebut neither the First Motion nor the Second Motion and the propensity for mis-statements made by the UNDU should render the credibility of the same before this Chamber to be of zero value. Reconsideration is appropriate and should be granted, or in the alternative the matter should be subjected to a fair review by a new panel of judges.

Word count:2122

RESPECTFULLY SUBMITTED BY:



Branko Lukić

Lead Counsel for Ratko Mladić



Dragan Ivetić

Co-Counsel for Ratko Mladić

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

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Confidential

ANNEX A

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

Case No. MICT-13-56-A

BEFORE THE APPEALS CHAMBER

THE PROSECUTOR

v.

RATKO MLADIĆ

Public Redacted

ANNEX B1

From: Dragan Ivetic, [REDACTED]
To: Detention Unit, [REDACTED]
Cc: Radovan Djurdjevic, [REDACTED], Branko Lukic, [REDACTED]

Date: Monday, April 16, 2018 09:20AM
Subject: Visit (legal) to Mr. Mladic

Dear All:

I wish to schedule a meeting with my client, Mr. Mladic for tomorrow, 17 April 2018 from 10:00-12:00h. I would be the only person in attendance for the same. Thus i would kindly ask that you let me know as soon as possible if the same can be confirmed.

Regards
Dan Ivetic

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

Case No. MICT-13-56-A

BEFORE THE APPEALS CHAMBER

THE PROSECUTOR

v.

RATKO MLADIĆ

Public Redacted

ANNEX B2

From: Dragan Ivetic, [redacted]
To: Detention Unit, [redacted]

Date: Thursday, November 02, 2017 03:25PM
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

After 13:00 will fit better my schedule - just let me know the time period

Danny

-----wrote: -----

To: Dragan Ivetic, [redacted]
From: Detention Unit, [redacted]
Sent by: [redacted]
Date: 11/02/2017 03:15PM
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

Or after 13:00?

Regards,

[redacted]
United Nations Detention Unit
E-mail: [redacted]
Ph: [redacted]
Fax: [redacted]

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:
[redacted]

▼ Dragan Ivetic---02/11/2017 13:24:45---Good day: General Mladic has requested that I come visit him tomorrow (3 November 2017) for a legal

From: Dragan Ivetic, [redacted]
To: Detention Unit, [redacted] Detention Unit [redacted]
Date: 02/11/2017 13:24
Subject: Visit to Mr. Mladic for Friday 3 November 2017

Good day:

MICT-13-56-A

3924

General Mladic has requested that I come visit him tomorrow (3 November 2017) for a legal visit. Can you accommodate this request by giving me 10-12:00 (just with me) or any other 2 hour time slot that you have available during the day (if that morning slot is not available).

Regards
Dragan Ivetic
co-counsel

From: Dragan Ivetic/[redacted]
To: Detention Unit/[redacted]

Date: Thursday, November 02, 2017 04:04PM
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

thank you

-----wrote: -----

To: Dragan Ivetic/[redacted]
From: Detention Unit/[redacted]
Sent by: [redacted]
Date: 11/02/2017 03:29PM
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

Visit is booked from 13:00 until 15:00.

Regards,

[redacted]
United Nations Detention Unit
E-mail: [redacted]
Ph: [redacted]
Fax: [redacted]

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:
[redacted]

▼ Dragan Ivetic---02/11/2017 15:25:14---After 13:00 will fit better my schedule - just let me know the time period Danny ----- [redacted]

From: Dragan Ivetic/[redacted]
To: Detention Unit/[redacted]
Date: 02/11/2017 15:25
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

After 13:00 will fit better my schedule - just let me know the time period

Danny

----- [redacted] wrote: -----

To: Dragan Ivetic, [redacted]
From: Detention Unit, [redacted]
Sent by: [redacted]
Date: 11/02/2017 03:15PM
Subject: Re: Visit to Mr. Mladic for Friday 3 November 2017

Or after 13:00?

Regards,

[redacted]
United Nations Detention Unit
E-mail: [redacted]
Ph: [redacted]
Fax: [redacted]

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:
[redacted]

Dragan Ivetic---02/11/2017 13:24:45---Good day: General Mladic has requested that I come visit him tomorrow (3 November 2017) for a legal

From: Dragan Ivetic, [redacted]
To: Detention Unit, [redacted] Detention Unit, [redacted]
Date: 02/11/2017 13:24
Subject: Visit to Mr. Mladic for Friday 3 November 2017

Good day:

General Mladic has requested that I come visit him tomorrow (3 November 2017) for a legal visit. Can you accommodate this request by giving me 10-12:00 (just with me) or any other 2 hour time slot that you have available during the day (if that morning slot is not available).

Regards
Dragan Ivetic
co-counsel

THE MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS

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BEFORE THE APPEALS CHAMBER

THE PROSECUTOR

v.

RATKO MLADIĆ

Public Redacted

ANNEX B3

From: Dragan Ivetic/[REDACTED]
To: Detention Unit/[REDACTED]

Date: Thursday, November 09, 2017 10:51AM
Subject: Re: UNDU Visit 10 November 2017 General Mladic

dear [REDACTED]

I sent you an email on 2 November at 12:01 requesting that visit for Tuesday. If you want I can forward it to you again. Is 5 days not enough time?

Regards,
Dan

-----wrote: -----

To: Dragan Ivetic/[REDACTED]
From: Detention [REDACTED]
Sent by: [REDACTED]
Date: 11/09/2017 10:41AM
Subject: Re: UNDU Visit 10 November 2017 General Mladic

Dear Dan,

Visit confirmed as requested.

I am sorry that you had a problems on last Tuesday entering the UNDU but you could avoid that problem by booking the visit on time. Luckily, we could react on time.

Regards,

[REDACTED]
United Nations Detention Unit
E-mail: [REDACTED]
Ph: [REDACTED]
Fax: [REDACTED]

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:

[REDACTED]

▼ Dragan Ivetic---08/11/2017 18:23:05---Dear All: I would like to schedule a visit with my client, Mr. Mladic on 10 November 2017 at 9:00 to

From: Dragan Ivetic/[REDACTED]

To: Detention Unit, [REDACTED] Detention Unit, [REDACTED]
Date: 08/11/2017 18:23
Subject: UNDU Visit 10 November 2017 General Mladic

Dear All:

I would like to schedule a visit with my client, Mr. Mladic on 10 November 2017 at 9:00 to 12:00h for purposes of a legal visit.

Accompanying me will be my case manager Radovan Djurdjevic.

Please kindly confirm this request and approval of the same.

Regards
Dan Ivetic
co-counsel

From: Detention [REDACTED]
Sent by: [REDACTED]
To: Dragan Ivetic, [REDACTED]

Date: Thursday, November 09, 2017 11:08AM
Subject: Re: UNDU Visit 10 November 2017 General Mladic

Dear Dan,

I have only your e-mail from 2 November booking visit for Friday, 3 November 2017. Please, forward me your e-mail booking visit on Tuesday - it might has slipped my attention.

Regards,

[REDACTED]
United Nations Detention Unit
E-mail: [REDACTED]
Ph: [REDACTED]
Fax: [REDACTED]

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:
[REDACTED]

▼ [Dragan Ivetic---09/11/2017 10:51:55---dear Neven: I sent you an email on 2 November at 12:01 requesting that visit for Tuesday. If you wa](#)

From: Dragan Ivetic, [REDACTED]
To: Detention Unit/[REDACTED]
Date: 09/11/2017 10:51
Subject: Re: UNDU Visit 10 November 2017 General Mladic

dear [REDACTED]

I sent you an email on 2 November at 12:01 requesting that visit for Tuesday. If you want I can forward it to you again. Is 5 days not enough time?

Regards,
Dan

-----wrote: -----

To: Dragan Ivetic
From: Detention Unit
Sent by:
Date: 11/09/2017 10:41AM
Subject: Re: UNDU Visit 10 November 2017 General Mladic

Dear Dan,

Visit confirmed as requested.

I am sorry that you had a problems on last Tuesday entering the UNDU but you could avoid that problem by booking the visit on time. Luckily, we could react on time.

Regards,

United Nations Detention Unit
E-mail:
Ph:
Fax:

Visiting address:
P.I Haaglanden vestiging Scheveningen
Pompstationsweg 32
2597 JW, Den Haag
The Netherlands

Mailing address:

Dragan Ivetic---08/11/2017 18:23:05---Dear All: I would like to schedule a visit with my client, Mr. Mladic on 10 November 2017 at 9:00 to

From: Dragan Ivetic
To: Detention Unit/ Detention Unit/
Date: 08/11/2017 18:23
Subject: UNDU Visit 10 November 2017 General Mladic

Dear All:

I would like to schedule a visit with my client, Mr. Mladic on 10 November 2017 at 9:00 to 12:00h for purposes of a legal visit.

Accompanying me will be my case manager Radovan Djurdjevic.

Please kindly confirm this request and approval of the same.

Regards
Dan Ivetic
co-counsel





From: Dragan Ivetic, [redacted]
To: [redacted]

Date: Thursday, November 09, 2017 10:52AM
Subject: Fw: Visit to Mr. Mladic

-----Forwarded by Dragan Ivetic/ICTY ADC/EXT on 11/09/2017 10:52AM -----

To: Detention Unit/[redacted] Detention Unit/[redacted]
From: Dragan Ivetic/ICTY ADC/EXT
Date: 11/02/2017 12:14AM
Subject: Visit to Mr. Mladic

Dear all:

I would like to schedule a legal team visit to Mr. Mladic on 7 November 2017 from 10:00-12:00h
The visitors would be myself and Radovan Djurdjevic.

Regards
Dan Ivetic





**TRANSMISSION SHEET FOR FILING OF DOCUMENTS WITH THE
MECHANISM FOR INTERNATIONAL CRIMINAL TRIBUNALS/
FICHE DE TRANSMISSION POUR LE DÉPÔT DE DOCUMENTS DEVANT LE
MÉCANISME POUR LES TRIBUNAUX PÉNAUX INTERNATIONAUX**

I - FILING INFORMATION / INFORMATIONS GÉNÉRALES

| | |
|---|---|
| To/ À : | <input type="checkbox"/> MICT Registry/ Greffe du MTPI <input type="checkbox"/> Arusha/ Arusha <input checked="" type="checkbox"/> The Hague/ La Haye |
| From/ De : | <input type="checkbox"/> Chambers/ Chambre <input checked="" type="checkbox"/> Defence/ Défense <input type="checkbox"/> Prosecution/ Bureau du Procureur <input type="checkbox"/> Other/ Autre : Lukic & Ivetic |
| Case Name/ Affaire : | Prosecutor vs. Ratko Mladic |
| Case Number/ Affaire n° : | MICT-13-56-A |
| Date Created/ Daté du : | 11.07.2018 |
| Date transmitted/ Transmis le : | 11.07. 2018 |
| No. of Pages/ Nombre de pages : | 25 |
| Original Language / Langue de l'original : | <input checked="" type="checkbox"/> English/ Anglais <input type="checkbox"/> French/ Français <input type="checkbox"/> Kinyarwanda <input type="checkbox"/> B/C/S <input type="checkbox"/> Other/Autre (specify/préciser) : |
| Title of Document/ Titre du document : | DEFENCE RESPONSE TO SECOND REGISTRAR'S SUBMISSION IN RELATION TO DEFENCE MOTIONS FOR RECONSIDERATION |
| Classification Level/ Catégories de classification : | <input checked="" type="checkbox"/> Unclassified/ Non classifié <input type="checkbox"/> Confidential/ Confidentiel <input type="checkbox"/> Strictly Confidential/ Strictement confidentiel <input type="checkbox"/> Ex Parte Defence excluded/ Défense exclue <input type="checkbox"/> Ex Parte Prosecution excluded/ Bureau du Procureur exclu <input type="checkbox"/> Ex Parte R86(H) applicant excluded/ Art. 86 H) requérant exclu <input type="checkbox"/> Ex Parte Amicus Curiae excluded/ Amicus curiae exclu <input type="checkbox"/> Ex Parte other exclusion/ autre(s) partie(s) exclue(s) (specify/préciser) : |
| Document type/ Type de document : | <input type="checkbox"/> Motion/ Requête <input type="checkbox"/> Decision/ Décision <input type="checkbox"/> Order/ Ordonnance <input type="checkbox"/> Judgement/ Jugement/Arrêt <input checked="" type="checkbox"/> Submission from parties/ Écritures déposées par des parties <input type="checkbox"/> Submission from non-parties/ Écritures déposées par des tiers <input type="checkbox"/> Book of Authorities/ Recueil de sources <input type="checkbox"/> Affidavit/ Déclaration sous serment <input type="checkbox"/> Indictment/ Acte d'accusation <input type="checkbox"/> Warrant/ Mandat <input type="checkbox"/> Notice of Appeal/ Acte d'appel |

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