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SCSL-03-01-PT
(4698-4705)



4698

THE SPECIAL COURT FOR SIERRA LEONE

Before: Justice George Gelaga King, President
Registrar: Mr. Lovemore Munlo SC
Date: 27 February 2007
Case No.: SCSL-2003-01-PT

THE PROSECUTOR

-v-

CHARLES GHANKAY TAYLOR

PUBLIC

ADDENDUM TO THE DEFENCE REPLY TO "REGISTRAR'S SUBMISSION PURSUANT TO RULE 33(B) IN RELATION TO ISSUES RAISED IN THE DEFENCE APPLICATION REQUESTING REVIEW OF THE MEMORANDUM OF UNDERSTANDING BETWEEN THE INTERNATIONAL CRIMINAL COURT AND THE SPECIAL COURT OF SIERRA LEONE DATED 13 APRIL 2006 & MODIFICATION OF MR. CHARLES TAYLOR'S CONDITIONS OF DETENTION"

Office of the Prosecution

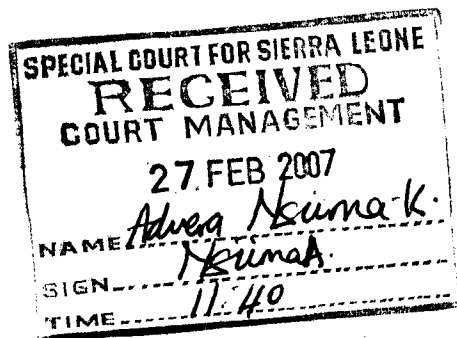
Mr. Stephen Rapp
Ms. Brenda Hollis
Ms. Wendy van Tongeren
Ms. Shyamala Alagendra
Mr. Alain Werner
Ms. Leigh Lawrie

Counsel for Charles Taylor

Mr. Karim A. A. Khan
Mr. Roger Sahota

Office of the Registrar

Mr. Lovemore G. Munlo, SC



I. Introduction and Background

1. On 26 February 2007, the Defence for Mr. Charles Ghankay Taylor (the “Defence”) filed a public “Defence Reply to the ‘Registrar’s Submissions Pursuant to Rule 33(B) in Relation to Issues Raised in the Defence Application Requesting Review of the Memorandum of Understanding Between the International Criminal Court and the Special Court of Sierra Leone Dated 13 April 2006 & Modification of Mr. Charles Taylor’s Conditions of Detention’”.¹ (“Defence Reply”)

2. In footnote 14 of the Defence Reply, the Defence explained that it had requested a Memorandum from the Office of the Principal Defender in regard to problems pertaining to the issuance of visas for Mr. Taylor’s family members to visit him in The Hague. However, the Memorandum had not been completed by the time of filing.

3. The Office of the Principal Defender subsequently delivered to the Defence a Memorandum in the form of a letter addressed to Lead Counsel at 6:00pm on 26 February 2007.²

II. Conclusion and Request

4. The Defence respectfully request that the President accept this Memorandum as an Addendum to the Defence Reply. According to Rule 19(C) of the Special Court for Sierra Leone Rules of Procedure and Evidence, the “President shall take all appropriate measures aimed at furthering the conduct of fair, impartial and expeditious trials and appeals.” The Defence respectfully submit that due to the informative and pertinent nature of the Memorandum from the Office of the Principal Defender, it would be an appropriate measure for the President to accept the Memorandum as an Addendum to the Defence Reply.

¹ *Prosecutor v. Taylor*, SCSL-03-01-PT-194, Defence Reply to the ‘Registrar’s Submissions Pursuant to Rule 33(B) in Relation to Issues Raised in the Defence Application Requesting Review of the Memorandum of Understanding Between the International Criminal Court and the Special Court of Sierra Leone Dated 13 April 2006 & Modification of Mr. Charles Taylor’s Conditions of Detention’, 26 February 2007.

² See Letter from the Office of the Principal Defender to Mr. Karim Khan, Re: Visits to Mr. Taylor in The Hague and Other Issues, dated 26 February 2007. [Confidential Annex A]

Respectfully Submitted,



Karim A. A. Khan

Lead Counsel for Mr. Charles Taylor

Done in Freetown this 27th Day of February 2007



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Court Management Section – Court Records

CONFIDENTIAL DOCUMENT CERTIFICATE

This certificate replaces the following confidential document which has been filed in the *Confidential* Case File.

Case Name: The Prosecutor – v- Charles Ghankay Taylor
Case Number: SCSL-2003-01-PT
Document Index Number: 196
Document Date 27 February 2007
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Number of Pages 8

Page Numbers from: 4701-4705

- Application
- Order
- Indictment
- Other**
- Correspondence

Document Title: CONFIDENTIAL ANNEX

Name of Officer:

Advera Nsiima K.

Signed: *Nsiima*