

**BEFORE THE TRIAL CHAMBER
EXTRAORDINARY CHAMBERS IN THE COURTS OF CAMBODIA**

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**LEAD CO-LAWYERS' RESPONSE TO TRIAL CHAMBER DIRECTIVES ON THE
TENDERING INTO EVIDENCE OF
CIVIL PARTY WRITTEN STATEMENTS & OTHER DOCUMENTS
(WITH CONFIDENTIAL & STRICTLY CONFIDENTIAL ANNEXES)**

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Before:

Trial Chamber

Judge NIL Nonn, President

Judge Silvia CARTWRIGHT

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I. INTRODUCTION

1. This submission responds primarily to the directives of the Trial Chamber contained in E96/7 and E223/2,¹ but also a number of recent decisions and directives issued by the Trial Chamber concerning the question of evidence proposed to be put or put before the Chamber and the related issue of the timely translation of these documents. Through this submission, Civil Parties endeavor to provide the Chamber with specifications on the Civil Party written statements that they seek to tender into evidence as well as set forth a clear plan that ensures that all other documents that they seek to tender into evidence will be available to the Chamber and parties prior to the close of the hearing of evidence in Case 002/01.
2. Though Civil Parties remain steadfast in their conviction that all Civil Party evidence on the Case File should be taken into account by the Trial Chamber in rendering its verdict in the present case, we have endeavored to comply with the Chambers directive that we reduce the number of documents Civil Parties seek to tender into evidence. In light of the substantial progress made by Civil Parties in complying with the Trial Chamber's directives on written evidence, as detailed below, Civil Parties urge the Chamber to balance the interests of efficiency in the proceedings, which is shared by Civil Parties, with the contribution that the evidence put forth by Civil Parties can make in ascertaining the truth concerning the crimes being tried in Case 002/01, the Civil Parties interest in meaningful participation before the ECCC (by ensuring that their most relevant and probative testimony is considered by the Chamber), and the fundamental principle guaranteeing that victim rights are respected throughout these proceedings.²

¹ See Decision on Co-Prosecutors' Rule 92 Submission Regarding the Admission of Witness Statements and Other Documents before the Trial Chamber, E96/7, 20 June 2012 (hereinafter "Written Statements Decision"); and Trial Chamber Memorandum on Forthcoming Document Hearings and Response to Lead Co-Lawyers' memorandum concerning the Trial Chamber's request to identify Civil Party Applications for use at trial (E208/4) and KHIEU Samphan Defense Request to Revise Corroborative Evidence Lists (E223), E223/2, 19 October 2011 (hereinafter "Memorandum on Representative Sample").

² Rule 21(1)(c), Internal Rules (Rev. 8), Extraordinary Chambers in the Courts of Cambodia, 3 August 2011.

3. At the outset, Civil Parties highlight that, in light of the Supreme Court Chamber's recent annulment of the severance in Case 002³ and the resulting reevaluation of this issue by the Trial Chamber, they reserve the right to add to the list of documents annexed to this submission and to put additional documents from previous document lists before the Trial Chamber should the scope of the current proceedings be expanded to include elements that were not previously a part of the Case 002/01.

II. PROCEDURAL HISTORY

4. On 20 June 2012, the Trial Chamber issued the Written Statements Decision wherein it directed the parties who had proposed to put written statements or transcripts before the Chamber to, *inter alia*, review the documents in their relevant lists in accordance with the criteria set forth in the decision, further specify the evidentiary purpose for each document or category of document and consider limiting the number of documents sought to be put before the Chamber to a representative sample of documents.⁴
5. On 27 July 2012, the Civil Parties made their response to the Chamber's Written Statements Decision and the Chamber's subsequent directive to parties to indicate those written statements from their document lists filed in April 2011 that they propose to tender with relation to population movements phases 1 and 2.⁵ Among other arguments put forward in this submission, Civil Parties asserted that the body of evidence contained in Civil Party Applications should remain before the Chamber as a whole and that Civil Parties would continue to put Civil Party written statements before the Chamber during proceedings, especially in conjunction with oral examinations.⁶ Notwithstanding these

³ See Decision on the Co-Prosecutors' Immediate Appeal of the Trial Chamber's Decision Concerning the Scope of Case 002/01, **E163/5/1/13**, 8 February 2013.

⁴ Written Statements Decision, para. 35.

⁵ See Civil Party Lead Co-Lawyers' Response to the Decision on the Co-Prosecutors' Rule 92 Submission Regarding the Admission of Written Statements and Other Documents before the Trial Chamber (E96/7), and to Memorandum E208/3, Including Confidential Annexes 1 and 2, **E208/4**, 27 July 2012.

⁶ *Id.*, paras. 9-15 and 44-46.

arguments, Civil Parties also reserved the right to put forward a representative sample of civil party written statements.⁷

6. On 19 October 2012, the Trial Chamber issued its memorandum E223/2 which addressed forthcoming document hearings and the identification of Civil Party applications for use at trial wherein it requested parties “to indicate which additional documents, from their original (*i.e.* April 2011) document lists, they seek to tender in relation to the population movement and Tuol Po Chrey trial segments no later than 30 November 2012.”⁸ In the same memorandum, the Chamber further directed the Lead Co-Lawyers to “tailor the number of Civil Party applications they seek to tender so as to ensure that only those Civil Party applications which can be made available in all official ECCC languages by Friday 29 February 2013 [later corrected to 4 March 2013] are sought to be put into evidence.”⁹ The Trial Chamber also ordered the Lead Co-Lawyers to specify which Civil Party applications it seeks to tender into evidence as its representative sample and, in so doing, to provide “all other information sought by the Chamber in E96/7, paragraph 35.”¹⁰
7. On 28 February 2013, the Co-Prosecutors’ proposed a procedure to regulate the admission of documents which are not yet translated into the three languages of the ECCC.¹¹ The Co-Prosecutors’ detail and then call upon the Trial Chamber to rely upon ECCC precedent and international practice in reaching decisions on requirements for translation in the current proceedings. Accordingly, the Co-Prosecutors’ set out a procedure which would afford the Accused the opportunity to identify documents which are not translated and are

⁷ *Id.*, Conclusions, para. (d), p. 16.

⁸ Trial Chamber Memorandum on Forthcoming Document Hearings and Response to Lead Co-Lawyers’ memorandum concerning the Trial Chamber’s request to identify Civil Party Applications for use at trial (E208/4) and KHIEU Samphan Defense Request to Revise Corroborative Evidence Lists (E223), **E223/2**, 19 October 2011, para. 4.

⁹ *Id.*, para. 12.

¹⁰ *Id.*, para. 13.

¹¹ Co-Prosecutors’ Request to Establish a Procedure Regarding Admission of Documents not Translated in all ECCC Languages, **E223/2/6**, 28 February 2013.

not understood by the Accused and an opportunity for the Prosecution to reply and process such translations, where appropriate.¹²

III. DISCUSSION

A. Written Statements Tendered in Consequence of Decision E96/7

8. In response to the Trial Chamber's decision in E96/7 and subsequent directives in E223/2 noted above, the Civil Parties submit in **Annex 1 and 1 (a)** to this filing **a representative sample of written statements of Civil Parties who have not given oral testimony before the Chamber** in Case 002/01. This includes Civil Party written statements:
 - a) presented in key documents hearings by parties;
 - b) used during the examination of witnesses, Civil Parties and experts by parties;
 - c) of Civil Parties proposed to testify by Lawyers for Civil Parties, but not yet heard by the Trial Chamber;¹³
 - d) taken by the OCIJ in the form of Written Records of Interview; and
 - e) selected by Lawyers for Civil Parties to be included in this representative sample on the basis of the evidence contained therein.

9. While Civil Parties consider that the body of evidence contained in Civil Party Applications should remain before the Chamber as a whole, in the context of tendering some of these into evidence and pursuant to the Trial Chambers directives, Lawyers for Civil Parties have made a selection of such documents that relate to factual findings within the scope of Case 002/01, as previously severed, and evidence that relates to proving the five policies outlined in paragraphs 156-159 of the Closing Order.¹⁴

¹² *Id.*, para. 27-28.

¹³ Lawyers for Civil Parties note that it remains uncertain exactly which Civil Parties will in the end be called to testify before the Chamber. Accordingly, Lawyers for Civil Parties have included the Civil Party written statements of most Civil Parties who were proposed by Lawyers for Civil Parties to be heard by the Chamber, but have not yet been heard, including those deferred and pending scheduling.

¹⁴ Case 002 Closing Order, **D427**, 15 September 2010.

10. **Annex 1 and 1 (a)** consist of a total of 522 written statements of Civil Parties in the form of Victim Information Forms, Supplementary Statements, Written Records of Interview and other narrative accounts by Civil Parties describing their experiences and evidence relevant to Case 002/01. For each document contained in **Annexes 1 and 1(a)**, information is provided on the document number, document title, evidentiary purpose, and relevant points of the indictment in the three official languages of the ECCC. Each of the documents contained in this list was previously proposed in the Civil Parties' document lists relevant to Case 002/01.¹⁵ Moreover, all documents listed in **Annex 1** are on the Case File and, in almost all cases, are accessible to parties via Zylab.¹⁶ Where such documents are not available through Zylab, Civil Parties have made the appropriate inquiries and await a final determination on the status of protective orders so that the document may be declassified or removed from the list, accordingly. In such a case, details sought by the Trial Chamber, beyond the document number, can be found in **Annex 1(a)**.
11. On the point of **translation**, since the Chamber's issuance of E223/2, Civil Parties have understood and attempted to heed the Chamber's directives concerning the translation of written Civil Party statements for this revised and reduced document list. In this respect, Civil Parties note that they have, in consultation with and through the extensive efforts of ITU and RAU, made significant progress in obtaining the translation of the documents they include in their list. However, Civil Parties (and ITU) have faced significant challenges in finalizing the translation of all of these documents.
12. Apart from the time that it has taken to identify the relevant documents and translations required in consultation with thirty-one (31) Civil Party Lawyers, the Civil Parties have

¹⁵ See e.g. Revised Annex 7(a)(iii): Civil Party Applications, **E109/2.2**, 22 July 2011; see also Civil Party Lead Co-Lawyers Revised List of Documents and Exhibit Relevant to the First Four Trial Segments, **E109/2**, 22 July 2011, para. 12 (explaining that the full contents of the Civil Party Application, included any annexed documents in extensions to the D22 number, are included in the list).

¹⁶ The only documents not accessible in Zylab are those which remain classified as strictly confidential. These documents appear in **Annex 1** with only a document number and reference to the strictly confidential **Annex 1(a)**. For strictly confidential documents, Civil Parties have consulted with all parties concerned (e.g. Civil Party Lawyers, WESU, etc.) and are awaiting a final determination of the status of requested protective measures. If appropriate, we will seek the declassification of this document. If not, it will be removed from the list..

faced the unique challenge that most of the documents which they have sought to translate either had existing (as a consequence of an earlier bulk translation request¹⁷) or cancelled translation requests already in the system (carried out *en masse* by CMS in response to limitations on the system). Under such conditions, the Civil Parties cannot enter or modify translation requests directly through the interface. Rather, they must enter and modify requests through a variety of distinct means. Most commonly, this involves preparing a detailed spreadsheet for each document and each language translation requested for that document, which is then sent to RAU to be entered into the interface manually. This circumstance as well as the set-up of the interface itself has prevented Civil Parties from re-entering/re-activating requests or modifying the instructions associated with these requests directly through the translation interface.

13. Though Civil Parties have worked closely with ITU and RAU to raise and work around these limitations, it has significantly increased the steps and time required to make and manage each translation request for all sections concerned (LCLS, ITU and RAU). In addition to this, as the Chamber is likely aware, ITU has encountered its own obstacles in meeting the demands for translation, particularly in the Khmer-French and French-Khmer language combinations. Civil Parties have worked closely with ITU to resolve this problem including reentering and modifying translation requests to expedite their completion, but it is notable that the majority of the incomplete translation requests for documents in **Annex 1** concern translations between the Khmer and French languages.
14. In light of these challenges, the Civil Parties respectfully request that the Trial Chamber grant that all documents contained in **Annex 1** remain under consideration for admission into evidence and that the deadline for their translation into the three official languages of the Court be set for the close of the hearing of evidence in the current case.

¹⁷ Civil Party Lead Co-Lawyers had developed a plan in consultation with ITU and RAU to ensure the translation of Civil Party applications (including the Victim Information Form, Supplementary Information and relevant annexes) over the course of 2012-2013. The Lead Co-Lawyers Section provided ITU and RAU with a spreadsheet detailing these requests, which were input into the system by RAU in late August 2012.

C. All Other Categories of Documents Tendered & All Material Proffered

15. Civil Parties note the Chamber's most recent directives on the identification of documents pertaining to the remaining categories of evidence and the Chamber's position that all of these documents must be translated into the three official languages of the ECCC.¹⁸ Not unlike the Co-Prosecutors¹⁹ and in accordance with E223/2, Civil Parties had understood that the 4 March 2013 translation deadline applied only to the document types addressed in E96/7 and, later, E223/2. As noted earlier, until the point when Civil Parties received further directives from the Chamber on translation,²⁰ they did not realize that it was the Chamber's position that all documents tendered into evidence must be made available in all three official languages of the Chamber, much less by 4 March 2013.
16. Civil Parties reflect that though E131/1 does stipulate that "when documents are introduced at trial, these should *ordinarily* be available in all three ECCC official languages," and that the burden for such translations falls on parties,²¹ Civil Parties have been under the impression that subsequent modifications in the practice of putting documents before the Chamber²² meant that, where such a practice was accepted by the Chamber for a particular document, the translation of the relevant portion of this

¹⁸ See Decision on Objections to Documents Proposed to be Put before the Chamber in Co-Prosecutors' Annexes A6-A11 and A14-A20 and by the Other Parties, **E185/1**, 3 December 2012, para. 16 (indicating that parties who seek to tender documents at trial must ensure their timely translation in all three official languages of the ECCC); and Trial Chamber Memorandum, Response to Motions E246 and E185/1/1 and Other Sundry Requests Concerning Documents and Deadlines, **E246/1**, para. 3, 13 February 2012 (asserting that the 4 March 2012 deadline for translation of documents into all three official languages of the ECCC applies to "*all materials proposed for admission*" and that parties must ensure that "*all categories of evidence* tendered by them are so available by 4 March 2013 and that *all material proffered* can be made available before the Chamber in all three official ECCC languages prior to the conclusion of the hearing of evidence in Case 002/01") (emphasis added).

¹⁹ See Co-Prosecutors' Request for Clarification Regarding the Trial Chamber's "Decision on Objections to Documents Proposed to be Put before the Chamber in Co-Prosecutors' Annexes A6-A11 and A14-A20 and by the Other Parties," **E185/1/1**, para. 7 December 2012 (noting that prior to the Chamber's issuance of E185/1, the Co-Prosecutor's had understood that the Trial Chamber only required that Civil Party applications and witness statements (and complaints) be translated into all three official languages by the deadline set out in E223/2).

²⁰ See **E246/1**, para. 3, *supra* at note 15.

²¹ Trial Chamber Memorandum, Witness Lists for Early Trial Segments, Deadline for Filing of Admissibility Challenges to Documents and Exhibits, and Response to Motion E109/5, **E131/1**, p. 3, 25 October 2011 (emphasis added).

²² See **E246/1**, para. 3, *supra* at note 15 (referencing prior rulings of the Trial Chamber permitting parties to put documents before the Chamber in oral hearings two, and sometimes just one, ECCC official languages).

document into the Court's three languages no longer applied. By the point that the Chamber emphasized that translation into three languages was required by 4 March 2013 for a broader group of documents than Civil Parties had understood, it was already too late and simply impossible for them to successfully process the translation of those documents through ITU by the deadline.

17. Notwithstanding the Civil Parties view of the translation requirements up to this point, they are endeavoring to comply with the Chamber's directives to ensure the timely translation into the three official languages of the ECCC of documents sought to be tendered into evidence. At present, they are reviewing the following *other types of documents* put before the Chamber by Lawyers for Civil Parties to confirm their translation status and make additional translation requests, where necessary:

- a) documents included on document and exhibit lists submitted before the Chamber;²³
- b) documents put before the Chamber in key documents hearings;
- c) documents used in the examination of witnesses, Civil Parties and experts; and
- d) Civil Party written statements of Civil Parties who *have* given oral testimony.

18. With regard to item (d) above, Civil Parties highlight that Civil Party written statements of Civil Parties who *have already given oral testimony* are not the subject of E96/7 or the Chamber's subsequent and related directives. Therefore, these documents have not been included in Annex 1 and 1 (a). Civil Parties take the position that not only have these documents been put before the Chamber in accordance with Internal Rule 87(3), but also that the parties have been provided the opportunity to make objections to these documents and, where such objections have been overruled, these documents have been tendered into

²³ Civil Parties note that many of these documents have already been the subject of adversarial debate and are already put before the Chamber. *See e.g.* Decision Concerning New Documents and Other Related Issues, E190, 30 April 2012; and E185/1, *supra* at note 15.

evidence and are eligible for E3 classification.²⁴ With respect to the translation of these documents, in a large number of cases, Civil Parties had previously requested the translation of the relevant part of these documents in at least two languages. They are working now to finalize their review and ensure translations are timely processed in all three official languages of the ECCC.

19. Insofar as the Chamber considers that some or all of the document categories indicated in paragraph 16 above fall under the 4 March deadline, Civil Parties respectfully request that the Chamber grant that all documents of this type will be eligible for admission before the Chamber if they are translated in relevant part into the three official languages of the ECCC by the close of hearings in Case 002/01. Based on their initial analysis of these documents, they are confident that the related translation requests will be modest, particularly compared with those of other parties, and that such requests will not pose an undue burden on ITU and RAU. To further aid the Chamber in rendering a decision on this request, the Civil Parties will provide the Trial Chamber with a full accounting of all the documents under this heading which have already been tendering into evidence or are sought to be tendered into evidence with their translation status and a projected timeline for their completion, developed in consultation with ITU, by Friday, 12 April 2013.

D. Translation Requests for Documents Put Before the Chamber in Conjunction with the Examination of Upcoming (as yet Unscheduled) Witnesses, Civil Parties & Experts

20. The status of a significant number of the witnesses, Civil Parties and experts selected by the Chamber to give oral testimony remains uncertain. Without greater certainty as to which of these individuals will be heard by the Chamber, Civil Parties are not reasonably able to identify in advance which Civil Party Statements they might use in conjunction with the examination of this sizeable group of witnesses, Civil Parties and experts. Consequently, the Civil Parties reserve the right to put additional Civil Party written

²⁴ On this latter point, see the Lead Co-Lawyers e-mail to Susan Lamb and parties dated 19 February 2013 and titled "Follow-Up Issues in E246/1" in which Civil Parties request that the Chamber designate E3 numbers for those documents which meet the criteria set out by the Chamber and have not yet been so designated.

statements before the Chamber in conjunction with the examination of future witnesses, Civil Parties and experts.

21. Where Civil Parties do seek to put such a document before the Chamber, they will follow the practices established by the Chambers to date: 1) placing any such document on the interface at least twenty-four hours prior to the start of the examination; and 2) seeking the timely translation of the document in at least two languages for use during the examination. Additionally, Civil Parties will request that the translation of the document into all three official languages of the ECCC is completed as soon as possible, but no later than the close of the proceedings in Case 002/01. They do so with the understanding that, in putting the document before the Chamber in the context of an examination, all parties are afforded the opportunity to raise objections at that point and, if they choose not to do so, the opportunity for adversarial challenge has passed.

E. Admissibility & Probative Value of Documents Tendered

22. As ordered by the Trial Chamber,²⁵ Civil Parties provide in **Annexes 1 and 1(a)** information on the evidentiary purpose for which they seek to put each document contained in the list before the Chamber. As well, they specify points of the indictment to which the evidence in the statement relates. Where these documents include evidence on the acts and conduct of the accused, Civil Parties emphasize that they do not put this information forward to prove the acts and conduct of the accused, but rather in support of the permissible uses of this information, as established in the jurisprudence of international criminal courts and detailed in submissions before and decisions by the Trial Chamber.²⁶ This includes, for example, the purposes of establishing general policies and structure and the factual background of crimes.

²⁵ See supra at para. 3.

²⁶ See e.g. **E96/7**, supra at note 1, para. 21-22; and Co-Prosecutors' Further Request to Put Before the Chamber Written Transcripts with Confidential Annexes 1 to 16, **E96/8**, paras. 16-17.

23. In addition to the information contained in **Annexes 1 and 1(a)** supporting the admissibility and probative value of Civil Party written statements in the absence of the author's testimony, Civil Parties recall that they have previously made a number of written submissions addressing these topics.²⁷ Civil Parties provide the information contained in **Annexes 1 and 1(a)** in order to indicate sufficient grounds for the admission of these documents before the Chamber; however, this information is not intended to be exhaustive and Civil Parties reserve the right to specify additional details on these points in response to objections by the parties and in support of the Chamber affording probative value to this evidence.

IV. CONCLUSIONS

24. Civil Parties understand and seek to comply with the Trial Chamber's directives to finalize the translation of documents tendered into evidence. They have made significant progress in this regard and hope that the Chamber will appreciate the seriousness with which they have responded to their recent directives and the significant progress they have made in meeting the requirements set out in E96/7, E223/2 and E246/1. Moreover, Civil Parties strongly support the rationale and procedure set forth by the Co-Prosecutors' to deal with the translation of documents and call upon the Trial Chamber to adopt such practice and to grant the same rights in such a procedure to the Lead Co-Lawyers as those outlined for the Prosecution.


25. In consideration of the points raised above, Civil Parties respectfully request that the Trial Chamber:

- a) admit the Civil Party written statements contained in **Annexes 1 and 1 (a)** into evidence and assign each document E3 number, where this has not already been done; and

²⁷ See e.g. Civil Party Lead Co-Lawyers' Lists of Documents and Exhibit (7 and 8), **E9/32**, 19 April 2011; Civil Party and Lead Co-Lawyers' Response in Support of the Co-Prosecutors' Rule 92 Submission Regarding the Admission of Written Statements before the Trial Chamber, **E96/5**, 22 July 2011; Civil Party Lead Co-Lawyers' Response to the Decision on the Co-Prosecutors' Rule 92 Submission Regarding the Admission of Written Statements and Other Documents before the Trial Chamber (E96/7), and to Memorandum E208/3, Including Confidential Annexes 1 and 2, **E208/4**, 27 July 2012.

- b) grant that all documents types identified in paragraph 17 are put before the Chamber or admitted (where such a determination has already been made) and that the question of translation into the three official languages of the ECCC is dealt with in accordance with the Co-Prosecutors' proposed procedure on that point.

Respectfully submitted,

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