

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

**FILING DETAILS**

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**POSITION ON REMAINING PRELIMINARY OBJECTIONS RAISED BY THE  
IENG SARY DEFENCE TEAM**

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## I. INTRODUCTION

1. Pursuant to the Trial Chamber President Memorandum on ‘Further information regarding remaining preliminary objections’,<sup>1</sup> the Co-Lawyers for Nuon Chea (the ‘Defence’) adhere to the Ieng Sary Defence Team’s preliminary objection to the application of grave breaches of the Geneva Conventions due to the expiry of the applicable statute of limitations, but does not maintain the preliminary objection on the jurisdiction over the crime against humanity of deportation in respect of Prey Veng, Svay Rieng and the Tram Kok cooperatives. The Defence’s preliminary objection regarding the former adopts in its entirety the position of the Ieng Sary Defence Team.

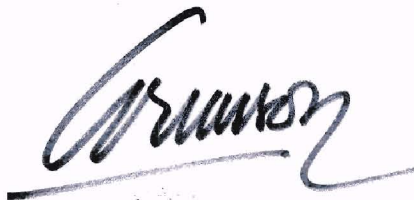
## II. LAW AND ARGUMENT

2. The Defence has hereby seen fit to present its arguments and respective legal basis in integral compliance to the content submitted in the Motion Against the Application of Grave Breaches for Ieng Sary.<sup>2</sup>

## III. CONCLUSION

3. The Defence endorses all the reasoning contained in the Motion brought before this Court by the Defence Team for Ieng Sary and, as it stands, requests the Trial Chamber to REJECT the application of Grave Breaches of the Geneva Conventions against Nuon Chea for the exposed arguments.

CO-LAWYERS FOR NUON CHEA



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<sup>1</sup> Document No. E306, ‘Further information regarding remaining preliminary objections,’ 25 April 2014, para.5.

<sup>2</sup> Document No. E43, Ieng Sary’s Rule 89 Preliminary Objection (Statute of Limitations for Grave Breaches), 14 February 2011, ERN 00643924-00643929.