

ANNEX A

IM CHAEM'S DEFENCE FILINGS FOR RECLASSIFICATION

ACCESS TO THE CASE FILE				
No.	Document no.	Title	Filing date	Suggested classification
1	D201	IM Chaem's Motion requesting Order for Access to the Case File	22 May 2014	Public
2	A151/1	IM Chaem's Letter to Co-Investigating Judges requesting Access to the Case File	1 August 2014	Public
3	D201/2	Supplemental Arguments to IM Chaem's Motion requesting Order for Access to the Case File	14 November 2014	Public

JUDICIAL DISAGREEMENTS				
No.	Document no.	Title	Filing date	Suggested classification
4	A122	IM Chaem's Letter requesting that All Formal Communications Relating to Ms. IM Chaem Include the Two Co-Investigating Judges and Request that Disagreements Regarding the Summoning and Charging of Ms. IM Chaem be Referred to the Pre-Trial Chamber	13 June 2014	Public
5	D204	IM Chaem's Motion Requesting Clarification Regarding Disagreements Between the Co-Investigating Judges	25 July 2014	Public
6	D293	IM Chaem's Request for Clarification on the Law Should there be a Disagreement Between the Co-Investigating Judges when Issuing the Closing Order	26 January 2016	Public

INITIAL APPEARANCE				
No.	Document no.	Title	Filing date	Suggested classification
7	A122/3	IM Chaem's Letter requesting for an Extension of Time to Reply to Your Letter Concerning the Preparation of Initial Appearance of Ms. IM Chaem	8 July 2014	Public
8	A122/5	IM Chaem's Letter Regarding Modalities of Service of Ms. IM Chaem's Summons	18 July 2014	Public
9	A151/2	Response to Co-Lawyers' Summons to Attend Her Proposed Initial Appearance on 8 August 2014	1 August 2014	Public
10	A151/3	IM Chaem's Letter requesting a Courtesy Copy of Her Summons to Appear at an Initial Appearance on 8 August 2014	1 August 2014	Public
11	D207	IM Chaem's Urgent Application to Seize the Pre-Trial Chamber with a Request for Annulment of Her and Her Co-Lawyers' Summonses Dated 31 July 2014	6 August 2014	Public
12	D236	IM Chaem's Motion to Reconsider and Vacate her Summons dated 29 July 2014	5 January 2015	Public
13	D236/1/1	IM Chaem's Notice of Appeal against International Co-Investigating Judge Harmon's Decision on the Motion to Reconsider and Vacate her Summons Dated 29 July 2014	27 February 2015	Public
14	D236/1/1/2	IM Chaem's Appeal Against the International Co-Investigating Judge's Decision on her Motion to Reconsider and Vacate her Summons Dated 29 July 2014	23 March 2015	Public
15	D236/1/1/4	IM Chaem's Response to the International Co-Prosecutor's Requests for Extension of Time to Respond to Her Appeals	5 June 2015	Public
16	D236/1/1/7	IM Chaem's Reply to the International Co-Prosecutor's Response to her Summons Appeal	29 June 2015	Public

CHARGING IN ABSENTIA				
No.	Document no.	Title	Filing date	Suggested classification
17	D239/1	IM Chaem's Notice of Appeal against International CO-Investigating Judge Harmon's Decision to Charge Her <i>in Absentia</i>	16 March 2015	Public
18	D239/1/1	IM Chaem's Request to File Her <i>in Absentia</i> Charging Appeal in English First	1 April 2015	Public
19	D239/1/2	IM Chaem's Appeal Against the International Co-Investigating Judge's Decision to Charge her <i>in Absentia</i>	2 April 2015	Public
20	D239/1/4	IM Chaem's Response to the International Co-Prosecutor's Requests for Extensions of Time to Response to Her Appeals	5 June 2015	Public
21	D239/1/7	IM Chaem's Reply to International Co-Prosecutor's Response to her Appeal Against the Decision to Charge her <i>in Absentia</i>	8 July 2015	Public

PLACEMENT OF INFORMATION ON THE CASE FILE				
No.	Document no.	Title	Filing date	Suggested classification
22	D247	IM Chaem's Request for Audio and Video Recordings of Written Records of Interviews Disclosed in Case File 004	2 June 2015	Public
23	D249	IM Chaem's Request for a Legible Copy of D123/1/5.1c to be Placed on the Case File	3 June 2015	Public
24	D255	IM Chaem's Request That the Audio or Video Record of D106/8 and All Audio or Video Records of Interviews Existing in Case 004 Be Placed on the Case File	6 July 2015	Public
25	D251/5/1	IM Chaem's Request that Confidential Documents from Case 002 cited in D251/5 be Placed on Case File 004	23 September 2015	Public
26	D279	IM Chaem's First Request for Investigative Action	3 December 2015	Public
27	D283	IM Chaem's Request for Disclosure of Unredacted Case 002 Transcripts and Related Documents Relevant to Her	15 December 2015	Public

28	D282/3	IM Chaem's Letter Concerning Placement of DC-Cam Audio Recordings on the Shared Materials Drive	17 December 2015	Public
29	D287	IM Chaem's Combined Requests Concerning the Third Introductory Submission	5 January 2016	Public
30	D294	IM Chaem's Request for Case 002 Filings	2 February 2016	Public
31	D295	IM Chaem's Combined Requests regarding Written Records of Interviews	2 February 2016	Public
32	D300/1	IM Chaem's Response to the International Co-Prosecutor's Request in Response to the Order for Severance of IM Chaem from Case 004	2 March 2016	Public
33	D301	<i>Addendum</i> to IM Chaem's Combined Requests Regarding Written Records of Interview	3 March 2016	Public

INVESTIGATORY PRACTICES

No.	Document no.	Title	Filing date	Suggested classification
34	D252	IM Chaem's Motion Requesting the Co-Investigating Judges to Resume the Audio or Video Recording of All Interviews	22 June 2015	Public
35	D298	IM Chaem's Application to Seize the Pre-Trial Chamber with a view to Annuling Transcripts of Written Records of Witnesses' Interviews	17 February 2016	Public
36	D298/1	<i>Addendum</i> to IM Chaem's Application to Seize the Pre-Trial Chamber with a view to Annuling Transcripts of Written Records of Witnesses' Interview	3 March 2016	Public
37	D298/2/1/2	IM Chaem's Reply to the International Co-Prosecutor's Response to her Application for Annulment of Records of Interviews	13 June 2016	Public
38	D296/2	IM Chaem's Request for Confirmation on the Scope of the Ao An's Annulment Application Regarding All Unrecorded Interviews	26 August 2016	Public
39	D296/3	<i>Corrigendum</i> to IM Chaem's Request for Confirmation on the Scope of the Ao An's Annulment Application Regarding All Unrecorded Interviews	7 September 2016	Public

CONCLUSION OF THE JUDICIAL INVESTIGATION				
No.	Document no.	Title	Filing date	Suggested classification
40	D286/2	IM Chaem's Submission on the Co-Investigating Judges' Notice of Intent to Dismiss the Charges against IM Chaem and to Sever the Proceedings against her	8 January 2016	Public
41	D286/3/1	IM Chaem's Response to the Co-Prosecutors' Submission on the Severance of the Proceedings Against her	18 January 2016	Public
42	D286/4	IM Chaem's Request for Exceptional Leave to file a Sur-Reply to the Co-Prosecutor's Reply on Severance (D286/3/2) and IM Chaem's Sur-Reply	26 January 2016	Public

CONSIDERATIONS ON PERSONAL JURISDICTION				
No.	Document no.	Title	Filing date	Suggested classification
43	D251/2	IM Chaem's Response to the Co-Prosecutors' Request for Extension of Time in Relation to the Co-Investigating Judges' Request for Submissions on the ECCC Personal Jurisdiction (D251)	17 August 2015	Public
44	D251/4	IM Chaem's observations on whether she should be considered a "senior leader" or among "those who were most responsible"	21 September 2015	Public
45	D251/5/3	IM Chaem's Response to the International Co-Prosecutor's Submission on whether she should be considered a "senior leader" or among "those who were most responsible"	9 November 2015	Public
46	D304/3	IM Chaem's Letter to the Co-Investigating Judge on the filing of Public Redacted Version of the Co-Prosecutors' Final Submission	31 October 2016	Public
47	D304/5	Request to File the Response to the International Co-Prosecutor's Final Submission in English first with Khmer translation to follow	7 November 2016	Public