

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

FILING DETAILS

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**NUON CHEA'S RULE 87(4) REQUEST TO SUMMONS PATRICK HEUVELINE AS
A DEMOGRAPHICS EXPERT IN CASE 002/02 AND TO HAVE TWO RELATED
DOCUMENTS ADMITTED INTO EVIDENCE**

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I. APPLICABLE LAW

1. ECCC Internal Rules (Rev. 9), revised on 16 January 2015.

II. ECCC DECISIONS AND ORDERS

2. **D427**, ‘Closing Order’, 15 September 2010.
3. **E190**, ‘Decision Concerning New Documents and Other Related Issues’, 30 April 2012.
4. **E215**, ‘Decision on Assignment of Experts’, 5 July 2012.
5. **E289/2**, ‘Decision on Civil Party Lead Co-Lawyers’ Internal Rule 87(4) Request to Put Before the Chamber New Evidence (E289) and KHIEU Samphan’s Response (E289/1)’, 14 June 2013.
6. **E307/1**, ‘Decision on Parties’ Joint Request for Clarification Regarding the Application of Rule 87(4) (E307) and the Nuon Chea Defence Notice of Non-Filing of Updated Lists Evidence (E305/3)’, 11 June 2014.
7. **E313**, ‘Case 002/01 Judgement’, 7 August 2014.
8. **E367**, ‘Decision on Designation of 2-TCE-95’, 18 September 2015.
9. **E371/2**, ‘Request for Oral Submissions on Parties’ Requests to Hear Testimony of Ewa Tabeau’, 29 August 2016.
10. **E404/4**, Trial Chamber Memorandum entitled “Decision on the Admission Into Evidence of the Choeung Ek Study Document”, 23 May 2016.

III. TRANSCRIPTS

11. **E1/363.1**, Transcript of Trial Proceedings, 7 December 2015 (TC Ruling).
12. **E1/382.1**, Transcript of Trial Proceedings, 26 January 2016 (PRUM Sarat).
13. **Draft Transcript of Trial Proceedings**, 1 September 2016.
14. **Draft Transcript of Trial Proceedings**, 8 September 2016.

15. **E1/96.1**, Transcript of Trial Proceedings, 25 July 2012 (David CHANDLER).
16. **E1/179.1.1**, Transcript of Trial Proceedings, 10 April 2013 (François PONCHAUD).

IV. PARTIES FILINGS AND REQUESTS

17. **E415**, ‘Co-Prosecutors’ Rule 87 (4) Request to Admit Documents Relevant to the Testimony of Michael Vickery and Henri Locard, 13 July 2016.
18. **E415/2**, Co-Prosecutors’ Rule 87(4) Request to Admit Documents Relevant to the Testimony of Michael Vickery and Henri Locard, 13 July 2016.

V. EVIDENCE

19. **E3/1757**, ‘Cambodia 1975-1982’, Michael Vickery.
20. **E3/1798**, Patrick Heuveline, ‘The Unbearable Uncertainty of Numbers: Estimating the Death Toll of the Khmer Rouge Period’, 1998.
21. **E3/1799**, Patrick Heuveline, ‘Between One and Three Million: Towards the Demographic Reconstruction of a Decade of Cambodian History (1970-1979)’, 1998.
22. **E3/1801**, B. SHARP: Counting Hell.
23. **E3/1813**, Craig Etcheson, *After the Killing Fields*.
24. **E3/1821**, Marek Sliwinski, *Le Génocide Khmer Rouge, une analyse démographique*.
25. **E3/1822**, Ysa Osman, *Oukoubah: Justice of the Cham Muslims under the Democratic Kampuchea Regime*.
26. **E3/2376**, Nayan Chanda, *Brother Enemy: The War After the War*.
27. **E3/2413**, ‘Demographics Expert Report, Khmer Rouge Victims in Cambodia, April 1975-January 1979, A Critical Assessment of Major Estimates’ (“Demographics Expert Report”), 30 September 2009.
28. **E3/2959**, Gender Based Violence During the Khmer Rouge Regime, Stories of Survivors from the Democratic Kampuchea (1975-1979), 2008.

29. **E3/3304**, Ben Kiernan, 'Genocide and Democracy in Cambodia'.
30. **E3/9686**, Ben Kiernan, *Genocide and Resistance in Southeast Asia*.
31. **E3/10654**, Gender Based Violence Againsts sexual Minorities during the Khmer Rouge Regime, 2015.
32. **E3/10655**, Motherhood at war: Pregnancy during the Khmer Rouge Regime, 2015.
33. **E3/10657**, Summary of More than White Cloth, Women's Rights in Cambodia, 2010.

VI. ATTACHMENTS

34. Email from the Trial Chamber Senior Legal Officer to the Parties, 7 September 2016, (**Attachment 1**).
35. Email from the Trial Chamber Senior Legal Officer to the Parties, 13 September 2016, (**Attachment 2**).
36. Email from the Trial Chamber Legal Officer to the Parties, 15 July 2016, (**Attachment 3**).
37. National Foreign Assessment Center, Kampuchea: A Demographic Catastrophe, 17 January 1980 ('CIA Demographics Report'), (**Attachment 4**).
38. Patrick Heuveline's Curriculum Vitae, (**Attachment 5**).

VII. OTHER DOCUMENTS

39. **E404/4/2.2**, 'Skull by skull, team catalogues KR killings'.
40. **E404/5**, 'Mr. 2-TCE-1062 (CONFIDENTIAL)', 23 August 2016.
41. **E415/2.2.2**, Patrick Heuveline, 'The Boundaries of Genocide: Quantifying the Uncertainty of the Death Toll During the Pol Pot Regime in Cambodia (1975-1979)', 2015.