

BEFORE THE TRIAL CHAMBER**EXTRAORDINARY CHAMBERS IN THE COURTS OF CAMBODIA****FILING DETAILS****Case No:** 002/19-09-2007-ECCC/TC**Party Filing:** The Defence for IENG Sary**Filed to:** The Trial Chamber**Original language:** ENGLISH**Date of document:** 31 May 2012**CLASSIFICATION****Classification of the document
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**IENG SARY'S EXPEDITED REQUEST FOR EXTENSION OF TIME TO RESPOND
TO CO-PROSECUTORS' REQUEST FOR LEAVE TO PROVIDE ASSURANCES
WITH RESPECT TO NON-PROSECUTION FOR WITNESSES**

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The Trial Chamber Judges:
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Reserve Judge THOU Mony
Reserve Judge Claudia FENZ

Co-Prosecutors:
CHEA Leang
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All Defence Teams**All Civil Parties**

Mr. IENG Sary, through his Co-Lawyers (“the Defence”), pursuant to Rule 39(4)(a),¹ hereby requests an extension of time until 15 June 2012 to respond to the Co-Prosecutors’ Request for Leave to Provide Assurances with Respect to Non-Prosecution for Witnesses.² This Request is made necessary because: a. the OCP’s Request raises a number of complex legal issues which merit proper consideration and response; b. the OCP Request was filed at a time when the parties are in the process of examining numerous witnesses; c. the requirement of filing in two languages reduces the period available to draft a response; and d. there are upcoming holidays for national staff on 1 June³ and 4 June⁴ during which time translators will not work. It is respectfully submitted that the normal ten-day time limit to respond to motions⁵ is insufficient in this instance. Recognizing the importance of the issues raised in the OCP Request and the need for its expedited consideration, the Defence requests a modest extension of four days beyond the normal filing deadline.

WHEREFORE, for all the reasons stated herein, the Defence respectfully requests the Trial Chamber to GRANT it an extension of time to respond to the Co-Prosecutors’ Request for Leave to Provide Assurances with Respect to Non-Prosecution for Witnesses until 15 June 2012.

Respectfully submitted,

ANG Udom



Michael G. KARNAVAS

Co-Lawyers for Mr. IENG Sary

Signed in Phnom Penh, Kingdom of Cambodia on this **31st** day of **May, 2012**

¹ Rule 39(4)(a) of the ECCC Internal Rules allows the Trial Chamber to extend the applicable time limit.

² Co-Prosecutors’ Request for Leave to Provide Assurances with Respect to Non-Prosecution for Witnesses, 30 May 2012, E200.

³ See Information Circular, Official Holidays for 2012, 1 December 2011.

⁴ See Email Broadcast sent on behalf of the Office of Administration, “Announcement for ECCC National Staff related to voting in commune election,” 29 May 2012.

⁵ Practice Direction on the Filing of Documents at the ECCC, Rev. 8, Art. 8.3.