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SCSL-03-01-T
(11298-11300)

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THE SPECIAL COURT FOR SIERRA LEONE

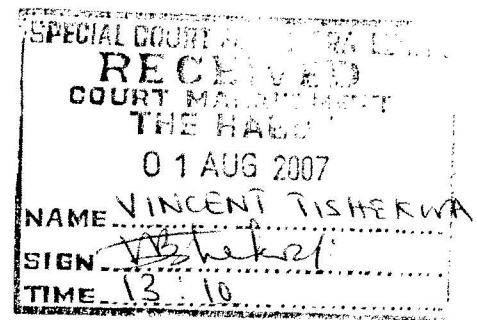
In Trial Chamber II

Before: Justice Julia Sebutinde, Presiding
Justice Richard Lussick
Justice Teresa Doherty
Justice El Hadji Malick Sow, Alternate

Registrar: Mr. Herman von Hebel

Date: 01 August 2007

Case No.: SCSL-2003-01-T



THE PROSECUTOR

—v—

CHARLES GHANKAY TAYLOR

PUBLIC AND URGENT

**DEFENCE REPLY TO THE PROSECUTION RESPONSE TO DEFENCE MOTION
FOR ADJOURNMENT TO ALLOW THE DEFENCE ADEQUATE TIME AND
FACILITIES TO PREPARE AND OTHER ANCILLARY MATTERS**

Office of the Prosecutor

Ms. Brenda J. Hollis
Ms. Ann Sutherland

Defence Counsel for Charles G. Taylor

Mr. Courtenay Griffiths Q.C.
Mr. Terry Munyard
Mr. Andrew Cayley

I. Introduction and Procedural Background

1. The Defence hereby files the following Reply to the Prosecution's Response to the Public and Urgent Motion for Adjournment to Allow the Defence Adequate Time and Facilities to Prepare and Other Ancillary Matters dated 31 July 2007.
2. In its Application,¹ the defence requested (a) an adjournment of the current proceedings until Monday 7th January 2008 to allow new defence counsel adequate time and facilities to prepare Mr. Charles Ghankay Taylor's defence; (b) that a new date be fixed in early September 2007 for the next hearing, and (c) a reasonable period of time for the defence to respond to six outstanding Prosecution motions.
3. Significantly, the Prosecution Response not only agrees with the Defence application, it also supports it.² The Prosecution concluded that the Defence has established "good cause" for the delay sought to permit new defence counsel time to prepare, especially in the light of Mr. Taylor's fundamental right to a fair trial under Article 17 of the Statute of the Court.
4. However, the Prosecution submits that the Defence request for an adjournment based on "alleged inadequate facilities" is without merit.³

II. Submission

5. The Defence wishes to clarify that the thrust of our application is for adequate time to prepare Mr. Taylor's case. While the Defence has been provided various facilities, such as offices in The Hague, Freetown and Monrovia, the legal team has not yet had time to read into the case, take instructions from the client or to travel to the various geographical locations. Nor has the team had time to meet all its members or to hire the Legal Assistants or Witness Management Officers provided by the Court.

¹ *Prosecution v. Taylor*, SCSL-03-01-T-323, Public and Urgent Defence Motion for Adjournment to Allow the Defence Adequate Time and Facilities to Prepare and Other Ancillary Matters, 31 July 2007.

² *Prosecution v. Taylor*, SCSL-03-01-T-324, Prosecution's Response to Defence Motion for Adjournment, 31 July 2007.

³ Prosecution Response, para. 7.

III. Conclusion

6. For all the reasons set out in the initial Application, the Defence respectfully requests that the Trial Chamber grant the relief sought.

A handwritten signature in black ink, appearing to read 'Griffiths', is written over a horizontal line.

Courtenay Griffiths Q.C.
Lead Counsel for Charles G. Taylor

Dated: 01 August 2007

The Hague, The Netherlands