

I. INTRODUCTION

1. Pursuant to Rule 7 of the Rules of Procedure and Evidence (“Rules”), the Prosecution files its reply to the “Defence Response to ‘Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure’” filed on 19 March 2007 (“Response”).

II. SUBMISSIONS

2. The Defence states that it does not oppose the orders sought.¹ Despite the fact that, in paragraphs 5 and 6 of the Response, the Defence argues against issuing the orders sought, the Prosecution takes the Defence at its word that it is not opposing the Motion. To the extent the Trial Chamber considers the Defence Response is in effect opposing the relief sought, the Prosecution relies on its submissions in its Motion, including the submissions and declarations adopted therein.
3. The Defence assert that “any disclosure of evidence the Prosecution intends to call ... which occurs less than three months before the trial start date must, *prima facie*, and in the absence of a explanation, be considered late disclosure.”² This assertion is contrary to the plain language of Rule 66 (A) (ii), which establishes that disclosure must be made no later than **60 days** before the date for the trial, absent a showing of good cause.³ Prosecution disclosure made in accordance with that Rule is not untimely.

¹ *Prosecutor v. Taylor*, SCSL-03-01-PT-207, “Defence Response to ‘Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure,’” 19 March 200, para. 3.

² *Ibid.*

³ Rule 66 (A) (ii) of the Rules for Procedure and Evidence provides that the Prosecutor shall:
“Continuously disclosure to the Defence copies of the statements of all additional prosecution witnesses whom the Prosecution intends to call to testify, but not later than 60 days before the date for trial, or as otherwise ordered by a Judge of the Trial Chamber either before or after the commencement of the trial, upon good cause being shown by the Prosecution. [...]”

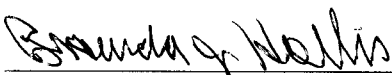
III. CONCLUSION

4. The Prosecution respectfully requests the Trial Chamber to grant the orders sought in the pending motions.⁴

Filed in Freetown,

21 March 2007

For the Prosecution,



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⁴ *Prosecutor v. Taylor*, SCSL-03-01-PT-200, “Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-public Disclosure”, 8 March 2007 and SCSL-03-01-PT-205, “Public Urgent Prosecution Motion for Leave to Substitute a Supplemented Witness List as Annex A(4) of the Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-public Disclosure filed on 8 March 2007,” 19 March 2007.

Index of Authorities

1. *Prosecutor v. Taylor*, SCSL-03-01-PT-200, Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure, 8 March 2007.
2. *Prosecutor v. Taylor*, SCSL-03-01-PT-205, Public Urgent Prosecution Motion for Leave to Substitute a Supplemented Witness List as Annex A (4) of the Confidential Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure filed on 8 March 2007, 19 March 2007.
3. *Prosecutor v. Taylor*, SCSL-03-01-PT-207, Confidential Response to “Urgent Prosecution Motion for Immediate Protective Measures for Witnesses and for Non-Public Disclosure,” 19 March 2007.