

THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

CASE No. IT-95-05/18-PT

IN TRIAL CHAMBER No. 3

Before: Judge Iain Bonomy, Presiding
Judge Christoph Flügge
Judge Michèle Picard

Acting Registrar: Mr. John Hocking

Date: 14 April 2009

THE PROSECUTOR

v.

RADOVAN KARADZIC

Public

MOTION FOR EXTENSION OF TIME TO
RESPOND TO 2nd AND 3rd MOTIONS
FOR JUDICIAL NOTICE OF ADJUDICATED FACTS

The Office of the Prosecutor:

Mr. Alan Tieger
Ms. Hildegard Uertz-Retzlaff

The Accused:

Radovan Karadzic

1. On 17 March 2009, there was filed the *Second Prosecution Motion for Judicial Notice of Adjudicated Facts...* In the 232-page motion, the prosecution sought judicial notice of 1049 adjudicated facts. This motion has never been served upon Dr. Karadzic and is apparently still being translated.

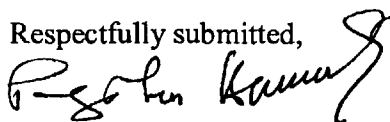
2. On 7 April 2009, there was filed the *Third Prosecution Motion for Judicial Notice of Adjudicated Facts*. In the 79 page motion, the prosecution sought judicial notice of an additional 497 adjudicated facts. The motion was served upon Dr. Karadzic in English on 7 April, and his response is currently due on 21 April 2009.

3. Dr. Karadzic is fortunate to have the assistance of Professor Goran Sluiter of the University of Amsterdam and Legal Intern Erica Finkle of Columbia University, who have agreed to assist him, part-time and *pro bono*, in responding to these motions, and checking each individual fact. However, the sheer volume of the motions make it impossible for Dr. Karadzic to adequately respond with the 14 days slated for responses to pre-trial motions.

4. It took Dr. Karadzic's team approximately five months to respond to the first judicial notice motion involving 343 adjudicated facts. While some economies can be expected, it is not possible for Dr. Karadzic to respond to the additional two motions involving 1546 adjudicated facts for an additional nine months. Therefore, he respectfully requests an extension of time until 21 January 2010 in which to respond to the second and third motions for judicial notice of adjudicated facts.

Word count: 335

Respectfully submitted,



Radovan Karadzic