

In: KSC-BC-2020-06
The Prosecutor v. Hashim Thaçi, Kadri Veseli, Rexhep Selimi and Jakup Krasniqi

Before: **Pre-Trial Judge**
Judge Nicolas Guillou

Registrar: Dr Fidelma Donlon

Filing Participant: Counsel for Hashim Thaçi
Counsel for Kadri Veseli
Counsel for Rexhep Selimi
Counsel for Jakup Krasniqi

Date: 18 November 2022

Language: English

Classification: Public

Joint Defence Notice Related to Agreement on Facts pursuant to Rule 95(3)

With Public Annex 1

Specialist Prosecutor

Jack Smith

Counsel for Victims

Simon Laws

Counsel for Hashim Thaçi

Gregory Kehoe

Counsel for Kadri Veseli

Ben Emmerson

Counsel for Rexhep Selimi

David Young

Counsel for Jakup Krasniqi

Venkateswari Alagendra

1. On 8 September 2022, the Pre-Trial Judge ordered the parties, pursuant to Rule 95(3) of the Rules, to file notices indicating where points of agreement on issues of law and/or facts have been reached in relation to their respective proposals by 18 November 2022.¹
2. Counsel for Hashim Thaçi, Counsel for Kadri Veseli, Counsel for Rexhep Selimi, and Counsel for Jakup Krasniqi (together, “the Defence”) hereby notify the Pre-Trial Judge that on 31 October 2022, they submitted a joint proposal for agreement on 135 facts related to crimes committed by the Serbian forces in 1998/1999 in Kosovo,² such as the details of the massacre of the Jashari family in Prekaz in March 1998,³ the Reçak/Račak massacre of January 1999,⁴ the Çikatovë e Vjetër/Staro Čikatovo massacre,⁵ and the Mejë/Meja massacre of April 1999.⁶
3. On 10 November 2022, the SPO informed the Defence that it will not be agreeing to the proposed facts in the Joint Defence proposal.

[Word count: 200 words]

Respectfully submitted,



Gregory W. Kehoe
Counsel for Hashim Thaçi

¹ KSC-BC-2020-06, Transcript of Fourteenth Status Conference, 8 September 2022, p. 1583, l. 16-20.

² Annex 1, Joint Defence proposal for agreement on facts pursuant to Rule 95(3).

³ *Ibid.*, Fact n° 2.

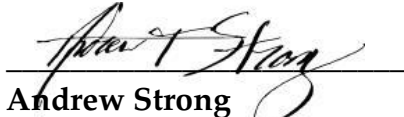
⁴ *Ibid.*, Fact n° 24.

⁵ *Ibid.*, Fact n° 76.

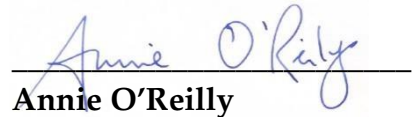
⁶ *Ibid.*, Fact n° 86



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