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SCSL-04-16-T

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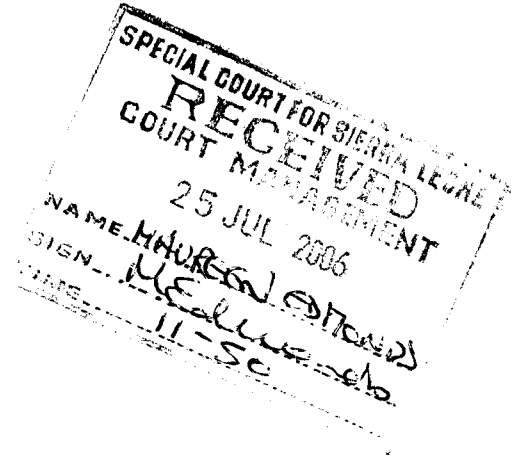
**SPECIAL COURT FOR
SIERRA LEONE**

Case No. SCSL-2004-16-T

BEFORE: Hon. Justice Richard Lussick, Presiding
Hon. Justice Julia Sebutinde
Hon. Justice Teresa Doherty

Registrar: Mr. Lovemore G. Munlo SC

Date filed: 25th July 2006



THE PROSECUTOR

Against

**ALEX TAMBA BRIMA, BRIMA BAZZY KAMARA AND SANTIGIE BORBOR
KANU**

**URGENT JOINT DEFENCE APPLICATION FOR A STATUS CONFERENCE
PURSUANT TO RULE 54 OF THE RULES OF PROCEDURE AND EVIDENCE
OF THE SPECIAL COURT FOR SIERRA LEONE**

Office of the Prosecutor:

Mr. Christopher Staker
Mr. Karim Agha
Mr. Charles Hardaway

Defence Counsel for Brima

Mr. Kojo Graham
Ms. Glenna Thompson

Defence Counsel for Kanu:

Mr. Geert-Jan Alexander Knoops
Ms. Carry Knoops
Mr. Abibola E. Manly-Spain

Defence Counsel for Kamara:

Mr. Andrew Daniels
Mr. Mohamed Pa-Momo Fofanah

I. INTRODUCTION

1. Alex Tamba Brima, Brima Bazzy Kamara, and Santigie Borbor Kanu were indicted on counts of Crimes against Humanity, Violations of Article 3 Common to the Geneva Conventions and of Additional Protocol II, and Other Serious Violations of International Humanitarian Law. The three accused pleaded not guilty to all charges.
2. The Pre-trial period in the case of the three AFRC accused persons covered the period from February 2004 to February 2005. The Prosecution opened its case against the three AFRC accused persons on March 7, 2005. On November 21, 2005 the Prosecution closed its case after calling fifty-nine witnesses.
3. On the 5th June, 2006 the AFRC Defence Teams opened their defence before Trial Chamber II of the Special Court for Sierra Leone. As at July 25th 2006 the AFRC Defence Teams have called 25 common witnesses.
4. The Defence herewith files this Urgent Defence Application (“Application”) pursuant to Rule 54 of the Rules of Procedure and Evidence of the Special Court of Sierra Leone (“Rules”).

2.1 Reasons for the Application

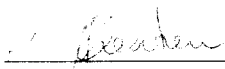
5. The Defence hereby informs the Honourable Trial Chamber that having called 25 (twenty- five) common witnesses in its defence so far, it has exhausted available witnesses for this Trial Session.
6. Considering that the calendar for the current Trial Session is scheduled to end on August 4th, 2006, the Defence requests a Status Conference to discuss the following issues:

- a) Status/Availability of Defence witnesses for the remainder of the Trial Session;
- b) Final witness list ordered to be filed by August 21st, 2006;
- c) Incomplete state of Defence investigations;
- d) Defence issues arising out of Article 17 of the Statute of the Special Court for Sierra Leone.

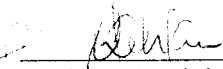
2.2 RELIEF

1. That the Trial Chamber schedules a Status Conference for Wednesday, July 26, 2006 to review the status of the case of the accused persons and afford them the opportunity to raise issues in relation thereto.


Respectfully submitted
On July 25th, 2006



Kojo Graham



Andrew Daniels



Geert-Jan Alexander Knoops