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SCSL-03-01-A  
(10457-10459)

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**THE SPECIAL COURT FOR SIERRA LEONE**  
**THE APPEALS CHAMBER**

**Before:** Justice Shireen Avis Fisher, Pre-Hearing Judge

**Registrar:** Ms. Binta Mansaray

**Date:** 4 December 2012

**Case No.:** SCSL-2003-01-A

**THE PROSECUTOR**

-v-

**CHARLES GHANKAY TAYLOR**

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**PUBLIC**

**URGENT DEFENCE MOTION TO RECLASSIFY PART OF PUBLIC ANNEX I TO ITS  
RULE 115 MOTION AS CONFIDENTIAL**

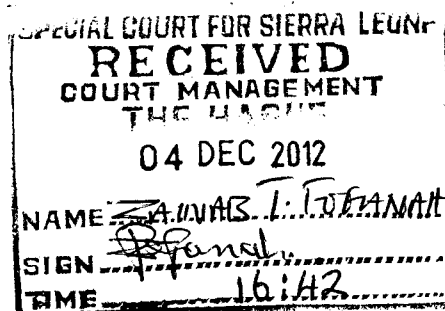
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**Office of the Prosecutor:**

Ms. Brenda J. Hollis  
Mr. Nicholas Koumjian  
Mr. Mohamed A. Bangura  
Ms. Nina Tavakoli  
Ms. Ruth Mary Hackler  
Ms. Ula Nathai-Lutchman  
Mr. James Pace  
Mr. C6man Kenny  
Ms. Leigh Lawrie  
Mr. Alain Werner  
Ms. Kathryn Howarth  
Ms. Ann Ellefsen-Tremblay

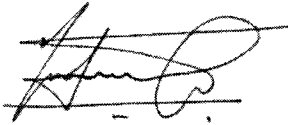



**Counsel for Charles G. Taylor:**

Mr. Morris Anyah  
Mr. Eugene O'Sullivan  
Mr. Christopher Gosnell  
Ms. Kate Gibson  
Ms. Magda Karagiannakis



1. The Defence hereby files this urgent motion to reclassify a publicly filed page to one filed confidentially,<sup>1</sup> in respect of its Rule 115 Motion.<sup>2</sup>
2. Annexed to the Rule 115 Motion was some of the proposed additional evidence,<sup>3</sup> including a Declaration of Ms. Alexandra Popov,<sup>4</sup> appending three images of a reception for the Judges of Trial Chamber II of the Special Court held on 31 May 2012.<sup>5</sup> Figure 1 appended to that declaration, a copy of the email invitation to the reception,<sup>6</sup> reveals the email addresses of two court officials, as well as the telephone numbers of one.
3. These personal details were included inadvertently. The Defence has made it a practice to redact or file confidentially submissions which reveal personal emails and phone numbers of court officials,<sup>7</sup> and wishes to remain consistent with its usual practice.
4. The Defence hereby (i) requests that Figure 1 be reclassified as confidential, or redacted as far as these contact details are concerned, in order to ensure the privacy of these court officials, and (ii) seeks an order to recall all distributed copies of the Rule 115 Motion and re-circulate it with the page in question included in the confidential section of the filing.

Respectfully submitted,

			
<b>Morris Anyah</b> <b>Lead Counsel for</b> <b>Charles G. Taylor</b>	Eugene O'Sullivan Co-Counsel for Charles G. Taylor	Christopher Gosnell Co-Counsel for Charles G. Taylor	Kate Gibson Co-Counsel for Charles G. Taylor

Dated this 4<sup>th</sup> Day of December 2012, The Hague, The Netherlands

<sup>1</sup> The filing of this motion before the Pre-Hearing Judge, Justice Shireen Avis Fisher, pursuant to Rules 109(B)(i) and 115(A), is without prejudice to *Prosecutor v. Taylor*, SCSL-03-01-A-1354, Charles Ghankay Taylor's Motion for Disqualification of Justice Shireen Avis Fisher from Deciding the Defence Motion to Present Additional Evidence Pursuant to Rule 115, 30 November 2012.

<sup>2</sup> *Prosecutor v. Taylor*, SCSL-03-01-A-1352, Public with Public Annexes A-E, G-K and Confidential Annex F Defence Motion to Present Additional Evidence Pursuant to Rule 115, 30 November 2012 ("Rule 115 Motion").

<sup>3</sup> See, Rule 115 Motion, para. 8 and all Annexes.

<sup>4</sup> A Legal Assistant on the Taylor Defence Team.

<sup>5</sup> Rule 115 Motion, Public Annex I.

<sup>6</sup> Rule 115 Motion, Public Annex I, CMS page 9897.

<sup>7</sup> See, for example, Rule 115 Motion, Public Annexes A, D, J and K.

**List of Authorities**

**SCSL**

*Rules of Procedure and Evidence of the Special Court for Sierra Leone*, as amended on 31 May 2012

*Prosecutor v. Taylor*, SCSL-03-01-A-1354, Charles Ghankay Taylor's Motion for Disqualification of Justice Shireen Avis Fisher from Deciding the Defence Motion to Present Additional Evidence Pursuant to Rule 115, 30 November 2012

*Prosecutor v. Taylor*, SCSL-03-01-A-1352, Public with Public Annexes A-E, G-K and Confidential Annex F Defence Motion to Present Additional Evidence Pursuant to Rule 115, 30 November 2012