

**Cour  
Pénale  
Internationale**



**International  
Criminal  
Court**

Original: **English**

No.: **ICC-02/17 OA OA2 OA3**

Date: **7 October 2019**

**THE APPEALS CHAMBER**

**Before:** Judge Piotr Hofmański, Presiding Judge  
Judge Chile Eboe-Osuji  
Judge Howard Morrison  
Judge Luz del Carmen Ibáñez Carranza  
Judge Solomy Balungi Bossa

**SITUATION IN THE ISLAMIC REPUBLIC OF AFGHANISTAN**

**Public with Public Annex A**

**Notice of Additional Parties to “Request Seeking Leave to File *Amicus Curiae*  
Submissions on Behalf of Human Rights Organizations in Afghanistan”  
(ICC-02/17-55 (OA OA2 OA3))**

**Source:** Afghanistan Human Rights Organizations

**Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:**

**The Office of the Prosecutor**

Ms Fatou Bensouda, Prosecutor

Mr James Stewart, Deputy Prosecutor

Ms Helen Brady

**Counsel for the Defence**

**Legal Representatives of the Victims**

Mr Fergal Gaynor *et al.*

Ms Katherine Gallagher

Ms Margaret Satterthwaite *et al.*

Mr Tim Moloney *et al.*

Ms Nancy Hollander *et al.*

**Legal Representatives of the Applicants**

**Unrepresented Victims**

**Unrepresented Applicants  
(Participation/Reparation)**

**The Office of Public Counsel for  
Victims**

Ms Paolina Massidda

**The Office of Public Counsel for the  
Defence**

**States Representatives**

***Amicus Curiae* Representatives**

**REGISTRY**

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**Registrar**

Mr Peter Lewis, Registrar

**Counsel Support Section**

**Victims and Witnesses Unit**

**Detention Section**

**Victims Participation and Reparations  
Section**

**Other**

1. On 25 June 2019, the Afghanistan Human Rights and Democracy Organization, Afghanistan Human Rights Organization, Afghanistan Forensic Science Organization, Feminine Solidarity for Justice Organization, and Afghan Victims' Families Association requested leave to jointly make submissions as an *amicus curiae* party ("Request").<sup>1</sup> This filing provides notice that 12 additional human rights organizations based in Afghanistan now join the Request.<sup>2</sup> An updated list of organizations party to the Request is appended to this notice at Annex A. The proposed submissions, if leave is granted, remain the same as those articulated in the Request.<sup>3</sup> So do the reasons for why those submissions should be permitted.<sup>4</sup>

2. The addition of 12 Afghanistan human rights organizations to a single filing is intended to facilitate greater judicial economy and efficiency. It is also intended to ensure that the proposed submissions benefit from a wide and diverse collection of viewpoints from human rights organizations working in Afghanistan, all of whom possess an intimate understanding of an issue at the heart of this appeal – the meaning of justice for victims in Afghanistan.<sup>5</sup>




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**Spojmie Nasiri**

**Lead Counsel for the Afghanistan Human Rights Organizations**

Dated this 7<sup>th</sup> day of October 2019

At San Francisco, USA

<sup>1</sup> Request Seeking Leave to File Amicus Curiae Submissions on Behalf of Human Rights Organizations in Afghanistan, [ICC-02/17-55 \(OA OA2 OA3\)](#), 25 June 2019 ("Request").

<sup>2</sup> The same collection of organisations made submissions before the Pre-Trial Chamber: *see* Amicus Curiae Submissions on Behalf of Human Rights Organizations in Afghanistan, [ICC-02/17-57](#), 11 July 2019.

<sup>3</sup> Request, paras. 6-12.

<sup>4</sup> Request, paras. 13-21.

<sup>5</sup> *See* Decision on the Prosecutor and Victims' Requests for Leave to Appeal the 'Decision Pursuant to Article 15 of the Rome Statute on the Authorisation of an Investigation into the Situation in the Islamic Republic of Afghanistan', [ICC-02/17-62](#), 17 September 2019, para. 36; Prosecution Appeal Brief, [ICC-02/17-74 \(OA OA2 OA3\)](#), 30 September 2019, paras. 157-166.