



Original: **English**

No.: **ICC-02/11-02/11**

Date: **13/08/2014**

PRE-TRIAL CHAMBER I

Before: Judge Silvia Fernández de Gurmendi, Single Judge

SITUATION IN THE REPUBLIC OF CÔTE D'IVOIRE

IN THE CASE OF THE PROSECUTOR v. CHARLES BLÉ GOUDÉ

Public Document

Defence response to Prosecution filing ICC-02/11-02/11-116

Source: Defence for Charles Blé Goudé

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

The Office of the Prosecutor

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Legal Representatives of the Victims

Legal Representatives of the Applicants

Unrepresented Victims

Unrepresented

Applicants

(Participation/Reparation)

**The Office of Public Counsel for
Victims**

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

States' Representatives

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REGISTRY

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Counsel Support Section

Deputy Registrar

Victims and Witnesses Unit

Detention Section

**Victims Participation and Reparations
Section**

**Other
Section**

Charles Blé Goudé ("the Suspect") hereby opposes the *Prosecution's Request for an Extension of the Page Limit for the Document Containing the Charges*.¹

The request to extend the page limit of the document containing the charges ("DCC") to 135 pages is both manifestly excessive and unwarranted.

As the Prosecutor argues, the DCC in the present case bears a "[c]lose [c]ontextual and [f]actual [n]exus to the Gbagbo Case" in which the charges were confirmed. Given the circumstances, the Prosecutor should now be able to refine her case if not for the sake of judicial economy then for the sake of the Suspect who is liable to be swamped in a morass of potentially irrelevant details. The DCC is not meant to be a doctoral thesis of biblical proportions but rather a clear and concise statement of the Prosecutor's case.

The Suspect is not in a position to assess the fifth "incident" which comprises "*the commission of multiple acts in the commune of Yopougon*". The Prosecutor is holding her cards close to her chest in advance of 22 August 2014. Notwithstanding, the Suspect assumes that the Prosecutor is inferring that as a result of one incident attributed to him – multiple acts of violence were committed. The Suspect does not see any reason to permit a page extension to enable the provision of lurid factual details pertaining to numerous acts of violence which can only be tenuously and fancifully linked to him.



Nicholas Kaufman

Counsel for Charles Blé Goudé

Done in Jerusalem, Israel
Wednesday, August 13, 2014

¹ ICC-02/11-02/11-116