

BEFORE THE TRIAL CHAMBER
SPECIAL TRIBUNAL FOR LEBANON

Case No: STL-11-01/T/TC

Before: Judge David Re, Presiding
Judge Janet Nosworthy
Judge Micheline Braidy
Judge Walid Akoum, Alternate Judge
Judge Nicola Lettieri, Alternate Judge

Registrar: Mr Daryl Mundis

Date: 28 May 2018

Filing Party: Defence Counsel - Oneissi

Original language: English

Classification: Public

PROSECUTOR

v.

**SALIM JAMIL AYYASH
HASSAN HABIB MERHI
HUSSEIN HASSAN ONEISSI
ASSAD HASSAN SABRA**

Summary of Facts of General El Sayed's Expected Testimony pursuant to the Trial Chamber Scheduling Order dated 16 May 2018

Office of the Prosecutor:
Mr Norman Farrell & Mr Nigel Povoas

Defence Office:
Ms Héleyn Uñac

Legal Representatives of Participating Victims:
Mr Peter Haynes, Mr Mohammad F. Mattar & Ms Nada Abdelsater-Abusamra

Counsel for Mr Salim Jamil Ayyash:
Mr Emile Aoun, Mr Thomas Hannis & Mr Chad Mair

Counsel for Mr Hassan Habib Merhi:
Mr Mohamed Aouini, Ms Dorothee Le Fraper du Hellen & Mr Jad Youssef Khalil

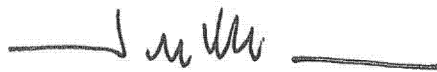
Counsel for Mr Hussein Hassan Oneissi:
Mr Vincent Courcelle-Labrousse, Mr Yasser Hassan & Ms Natalie von Wistinghausen

Counsel for Mr Assad Hassan Sabra:
Mr David Young, Mr Geoffrey Roberts & Ms Sarah Bafadhel



1. On 16 May 2018, the Trial Chamber ordered the Defence for Mr Oneissi (“Defence”) to provide a summary of facts for General Jamil El Sayed expected testimony (the “Order”).¹
2. In the Order, the Trial Chamber directed that “Defence witness summaries should be sufficiently detailed to allow the Prosecution to properly prepare for cross examination and assist the judges’ preparation to hear the witness’s evidence. The mere indication of topics that a witness may address is insufficient without an accompanying summary of the facts on which he will testify”.²
3. Pursuant to that Order, but without prejudice to the merits of the Defence Request for Reconsideration of the Order filed on 24 May 2018,³ the Defence is providing the summary of facts of General El Sayed’s testimony attached in Annex A in addition to the information contained in the existing summary circulated on 29 March 2018.⁴
4. The Defence insists that this summary of facts is submitted only to facilitate the scheduling of General El Sayed’s testimony and thus, to ensure that he appears next week, at the dates where he has been able to make himself available despite his demanding agenda.

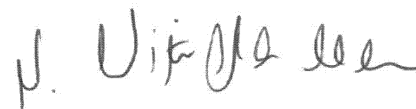
Submitted this 28th Day of May 2018



VINCENT COURCELLE-LABROUSSE
Lead Counsel for Hussein Hassan Oneissi



YASSER HASSAN
Co-Counsel for Hussein Hassan Oneissi



NATALIE von WISTINGHAUSEN
Co-Counsel for Hussein Hassan Oneissi

Word count: **350** words

¹ STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3665, Order to the Oneissi Defence to Provide a Summary of Facts of M. Jamil El-Sayyed’s Expected Testimony, 16 May 2018.

² *Ibid*, para. 13.

³ STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3671, Requête en Réexamen de l’Ordonnance délivrée à la Défense de M. Oneissi visant à communiquer un résumé des faits sur lesquels Général El Sayed sera appelé à témoigner, 24 May 2018.

⁴ STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3596/A02, Defence for Hussein Hassan Oneissi Submission Pursuant to the Trial Chamber’s Scheduling Order of 23 February 2018, Second Updated Annex A (Witness List), 29 March 2018. Please note that another Update of the Defence Witness List was filed on 17 May 2018; see F3650, Defence for Hussein Hassan Oneissi Request for Amendments to the Rule 128 Witness and Exhibit Lists and for the Admission of Documents Used by DHO-001, Annex E (Public Redacted Version) filed on 17 May 2018).

