

ក្រុមបេធាវីការពារក្តី អៀង សារី
IENG SARY DEFENCE TEAM
EQUIPE DE DEFENSE DE IENG SARY

ANG Udom and Michael G. KARNAVAS

Co-Lawyers for IENG Sary

22 June 2011

To: **Nisha Valabhji**
Officer in Charge and Deputy Head, Defence Support
Section (“DSS”)

Re: Furniture for Cells

Dear Ms. Valabhji,

We write to you in response to the email sent by Mr. Prezanti, on behalf of DSS, entitled “furniture for holding cells,” dated 7 June 2011.¹ After consulting with Mr. IENG Sary, we request the following items for the holding cell:

1. **A reclining bed with a firm mattress.** This will enable Mr. IENG Sary to follow the proceedings from his bed when he gets tired and retires to the holding cell. This was recommended by Dr. Campbell in his Geriatric Expert Report..
2. **A screen to display the proceedings which would face Mr. IENG Sary’s bed.** This request is so that Mr. IENG Sary does not need to strain his neck or back to view the proceedings.
3. **A reclining chair in the holding cell and in the courtroom.** This is a recommendation in Professor Campbell’s Geriatric Expert Report.
4. **An ergonomic set of headphones.** In order for Mr. IENG Sary to follow the proceedings, a more comfortable set of headphones is required than is currently provided. The current set of headphones cause Mr. IENG Sary discomfort, resulting in his inability to wear the headphones and follow the proceedings.
5. **A computer with ECCC intranet and internet access.** As Mr. IENG Sary will require the assistance of a team member in the holding cell, a computer with access to the ECCC intranet and internet is required. This will allow the team member who is physically present with Mr. IENG Sary in the holding cell to assist and communicate with the team in the courtroom.
6. **A worktable and chair.** As Mr. IENG Sary will require the assistance of a team member in the holding cell, a worktable and chair is required. This will allow the

¹ Email from Alex Prezanti to all Defence Teams, re: furniture for holding cells, 7 June 2011.

team member who is physically present with Mr. IENG Sary in the holding cell to assist the team in the courtroom.


7. **A small bookcase.** This will enable Mr. IENG Sary to hold his books and binders, as will be required during the trial proceedings.
8. **Videoconferencing equipment.** As Mr. IENG Sary will require the assistance of a team member in the holding cell, videoconferencing equipment is required. This will allow the team member who is physically present with Mr. IENG Sary in the holding cell to be able to follow the courtroom proceedings and assist and communicate with the team in the courtroom.
9. **A wheelchair.** This would enable Mr. IENG Sary to move within the court when required. This is a recommendation in Professor Campbell's Geriatric Expert Report.

Although not related to the furniture list for the holding cell, Mr. IENG Sary requests the following for his cell in the Detention Facility:

1. **A working shower water heater.** At present, the shower water heater in his cell in the Detention Facility is malfunctioning. The water either scalds him or freezes him, leaving him no option other than to keep the shower water heater off resulting in cold showers. Please can this either be fixed or replaced at the earliest possible convenience.

We look forward to your prompt response to these matters and thank you in advance for your assistance.

Respectfully,



ANG Udom



Michael G. KARNAVAS

Co-Lawyers for Mr. IENG Sary