

IN THE MATTER OF AN APPEAL UNDER S.103 and S.108 OF THE EXTRADITION ACT
2003

B E T W E E N:

JULIAN ASSANGE

Appellant

v

GOVERNMENT OF THE UNITED STATES OF AMERICA

Respondent

APPLICATION FOR AN EXTENSION OF TIME

1. The Appellant is bringing two connected appeals:
 - (i) An appeal pursuant the s.103(1) of the Extradition Act 2003, against the decision of the District Judge to send his case to the Secretary of State; and
 - (ii) An appeal pursuant to s.108(1) of the 2003 Act, against the decision of the Secretary of State for the Home Department to order his extradition to the United States of America.
2. This is an application by the Appellant for an extension of the period of time in which to served Perfected Grounds of Appeal and appeal bundle in both appeals to 28 August 2022.
3. Amended Grounds of Appeal must be served within 10 business days “unless the High Court otherwise directs”, i.e., by 14 July 2022 for an appeal filed on 30 June 2022 (Criminal Procedure Rules 2020 r.50(20)(5)(b)). Given the shortness of the current deadline for service of the Perfected Grounds of Appeal, the Appellant respectfully requests that this application might be given urgent consideration.

4. The Crown Prosecution Service, on behalf of the Government of the United States of America, have confirmed that they consent to this extension. The Government Legal Department have also confirmed their consent to this extension on behalf of the Secretary of State for the Home Department.

Reasons for the Application

5. These two appeals, which we respectfully invite the Court to join, comprise sixteen separate grounds of appeal, covering many more areas than the previous appeal by the US of the District Judges decision at first instance, brought on the basis of four grounds of appeal. The complexity of the matter and these continuing appeals make demands of all parties: we have confirmed to the Respondents that we would consent to an extension of time for the filing of the Respondent's Notices. It is hoped that the further time in which to refine the current potential Grounds of Appeal will in turn leave to economy of time needed for preparation and presentation of the appeal as a whole.
6. The Appellant's legal team face a number of particular difficulties with the present timetable. Counsel acting for the Appellant have heavy competing commitments in the coming weeks. One lawyer is shortly due to have a surgical procedure, in relation to a matter about which they have been advised there would be concern if it were postponed. In addition, there is the intervention of the month of August, in which one other senior lawyer is completely unavailable for personal reasons, not due to holidays.
7. By way of comparison, in the much narrower appeal of the District Judge's decision to discharge Mr Assange by the Government of the United States of America, the Appellant's Notice and Provisional Grounds of Appeal were filed on 15 January 2022. Following an application for an extension of time, the Perfected Grounds of Appeal were filed on 11 February 2022. Following extensions agreed by consent and granted by the court, the Respondent filed the Respondent's Notice on 6 April 2022.

30 June 2022