

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

ODYSSEY MARINE EXPLORATION, INC.

Plaintiff,

CIVIL ACTION

v.

Case No.: 8:06-CV-1685-T23-TBM

THE UNIDENTIFIED, SHIPWRECKED  
VESSEL OR VESSELS, their apparel, tackle,  
appurtenances and cargo located within  
center point coordinates: 49° 25' N, 6° 00' W;  
Radius: 5 nautical miles, *in rem*

Defendant(s).

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
KINGDOM OF SPAIN'S MOTION FOR AN ORDER REQUIRING PLAINTIFF TO  
PROVIDE A MORE DEFINITE STATEMENT AND ACCESS TO RELEVANT  
INFORMATION BEFORE KINGDOM OF SPAIN FILES RESPONSIVE PLEADING**

COMES NOW, Plaintiff, ODYSSEY MARINE EXPLORATION, INC. ("Odyssey"), by and through undersigned counsel, and moves this Honorable Court for an extension to respond to the KINGDOM OF SPAIN's Motion for an Order Requiring Plaintiff to Provide a More Definite Statement and Access to Relevant Information Before Kingdom of Spain Files Responsive Pleading (Docket #28) in this matter, and in support thereof would state:

1. ODYSSEY and the KINGDOM OF SPAIN have discussed this matter in detail and have agreed that an extension should be granted until July 23, 2007.
2. The reason for the extension is to allow ODYSSEY to conduct more research and to respond fully and completely to the Motion for an Order Requiring Plaintiff to Provide a More Definite Statement and Access to Relevant Information Before Kingdom of Spain Files Responsive Pleading.

3. It is anticipated that part of the response will be additional information provided to the KINGDOM OF SPAIN.

WHEREFORE, in light of the KINGDOM OF SPAIN's agreement, it is requested that the Court permit ODYSSEY until July 23, 2007, to respond to the Motion for an Order Requiring Plaintiff to Provide a More Definite Statement and Access to Relevant Information Before Kingdom of Spain Files Responsive Pleading.

**MEMORANDUM OF LAW**

The Federal Rules of Civil Procedure, Rule 6(b) provides that the Court can always extend or enlarge times when justice so requires. In this instance, it is in the benefit of justice to allow the extension of time to respond to the KINGDOM OF SPAIN's motion.

**CERTIFICATE UNDER LOCAL RULE 3.01(g)**

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that he has conferred in good faith with counsel for Claimant, Kingdom of Spain, concerning the substance of this motion, and that counsel agree on the resolution of same.

Respectfully submitted,

s/ Allen von Spiegelfeld

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