

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).

**THIRD JOINT MOTION FOR EXTENSION OF TIME TO FILE
COMPLETED CASE MANAGEMENT REPORT**

COMES NOW, Plaintiff, ODYSSEY MARINE EXPLORATION, INC., and Claimant KINGDOM OF SPAIN, by and through undersigned counsel, and respectfully moves this Honorable Court to extend the time for filing the Case Management Report until October 30, 2007, and in support thereof would state:

1. This case involves many complicated nuances, including sovereign immunity, maritime salvage, international treaties, and law of the sea.
2. The parties are preceding with the initial stages of pleadings, and as of yet, the case is not at issue.
3. In order to correctly prepare a Case Management Report, the parties agree that it is in the best interest of judicial economy to delay the filing of the Case Management Report until there is more certainty as to how the parties can and intend to proceed.

4. By granting an extension until October 30, 2007, the Court will provide the parties with the opportunity to prepare a meaningful Case Management Report.

WHEREFORE, the parties respectfully moves this Honorable Court for an extension until October 30, 2007, to prepare the Case Management Report in the above mentioned matter.

MEMORANDUM OF LAW

The Court has the inherent power under Federal Rules of Civil Procedure 1.01 to extend time periods when it is the best interest of judicial economy and justice. In this case, it is in the best interest of judicial economy to extend the time until October 30, 2007, to allow the parties to have a more meaningful presentation to the Court.

Respectfully submitted,

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