

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION  
IN ADMIRALTY

ODYSSEY MARINE EXPLORATION, INC.,

Plaintiff,

Case No. 8:07-CV-00614-SDM-MAP

v.

THE UNIDENTIFIED, SHIPWRECKED VESSEL,  
If any, its apparel, tackle, appurtenances and cargo  
located within a five mile radius of the center point  
coordinates provided to the Court under seal, *in rem*,

Defendant,

and

The Kingdom of Spain and the Republic of Peru,

Claimants.

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**UNOPPOSED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE  
AND WRITTEN DESIGNATION AND CONSENT TO ACT**

Mark Maney, Esquire, hereby moves, pursuant to Rule 2.02 Local Rules of the Middle District of Florida, for special admission to appear in this case *pro hac vice* as counsel for The Republic of Peru ("Peru"), and states as follows:

1. I reside in Houston, Texas, and am not a resident of the State of Florida.
2. I am a member, in good standing, of the Bar of the State of Texas since 1988 (Texas State Bar No. 12898200). I am also a member in good standing of the Bar of the United States District Courts for the Southern and Northern Districts of Texas and the United States Court of Appeals for the Fifth Circuit.

3. Timothy P. Shusta, Esq., of the law firm of Phelps Dunbar LLP, a member in good standing of the bars of the State of Florida and of this Court, consents to act and accepts designation as local counsel for the Republic of Peru in this case. Accordingly, all notices given or required to be given in this case, and all papers served in this case may be given to and served upon the Republic of Peru at the following address:

Timothy P. Shusta, Esq.  
Phelps Dunbar LLP  
100 S. Ashley Drive  
Suite 1900  
Tampa, Florida 33602-5315  
813.472.7582  
813.472.7570 (Fax)  
shustat@phelps.com

4. I have not previously requested *pro hac vice* admission before this Court and have not abused the privilege of appearance by special admission in other cases in Florida to a degree as to constitute maintenance of the regular practice of law in Florida.

5. I will submit to the Clerk the required Special Admission Attorney Certification and will pay the fee required for special admission.

6. I will register for CM/ECF and obtain a password for electronic filing within 20 days of special admission.

WHEREFORE, Mark Maney respectfully requests entry of an order granting his request to appear *pro hac vice* as counsel for the Republic of Peru in this case, and such other relief as this Court deems just and proper.

**RULE 3.01(f) CERTIFICATE**

I hereby certify that lead counsel for Odyssey Marine Exploration, Inc., and The Kingdom of Spain have been contacted regarding the relief requested in this motion and further certify that no party to this action opposes the relief requested.

Respectfully Submitted,

/s/ Mark Maney  
Mark Maney (Trial Counsel)  
Texas State Bar No. 12898200  
South Tower, Pennzoil Place  
711 Louisiana, Suite 3100  
Houston, Texas 77002  
713.654.8001  
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and

/s/ Timothy P. Shusta  
Timothy P. Shusta  
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Attorneys for the Republic of Peru

**Certificate of Service**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of Court via CM/ECF system on August 28, 2008. I also certify that the foregoing document is being served on all counsel of record on the attached Service List via

transmission of Notices of Electronic Filing generated by the CM/ECF system this **28th** day of August, 2008.

/s/ Timothy P. Shusta  
Timothy P. Shusta

**SERVICE LIST**

**CASE NO. CASE NO: 8:07-CV-00614-SDM-MAP**

Allen von Spiegelfeld, Esq. and Eric C. Thiel, Esq. Fowler White Boggs Banker, P.A. Post Office Box 1438 Tampa, FL 33601 Counsel for Plaintiff Odyssey Marine Exploration, Inc.	K. Russell LaMotte, Esq. Beveridge & Diamond, P.C. Suite 700 1350 I St. NW Washington, DC 20005-3311 Counsel for Plaintiff Odyssey Marine Exploration, Inc.
Melinda J. MacConnel, Esq. O'Brien, Bower, P.a. Suite 100 1304 De Soto Avenue Tampa, FL 33606 Counsel for Plaintiff Odyssey Marine Exploration, Inc.	James Goold, Esq. Covington & Burling, LLP 1201 Pennsylvania Ave. NW Washington, DC 20004-2401 Counsel for Claimant Kingdom of Spain
David C. Banker, Esq. Jeffrey C. Anderson, Esq. and Keith D. Skorewicz, Esq. Bush Ross, P.A. Post Office Box 3913 Tampa, FL 33601-3913 Counsel for Claimant Kingdom of Spain	