

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
IN ADMIRALTY**

ODYSSEY MARINE EXPLORATION, INC.,

Plaintiff,

v.

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

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,

Defendant,
in rem

and

THE KINGDOM OF SPAIN,

Claimant,

_____ /

**AGREED MOTION FOR LEAVE TO FILE
MOTIONS IN EXCESS OF LOCAL RULE 3.01 PAGE LIMITS**

Claimant Kingdom of Spain (“Spain”) and Plaintiff Odyssey Marine Exploration (“Odyssey”) hereby move for leave pursuant to Local Rule 3.01(d) to file a motion and an opposition, respectively, in excess of the page limits provided in Local Rule 3.01 (a) and (b).

More specifically, for the dispositive motion scheduled for filing by Spain on or before September 22, 2008 (Dkt.119), counsel for Spain requests leave to file a motion of no more than 35 pages in length, i.e. 10 additional pages. Counsel for Odyssey seeks leave for its opposition

due on or before November 17, 2008 to file an opposition also of no more than 35 pages in length, i.e. 15 additional pages.

The reason for these requests is to allow these parties to file memoranda of law sufficient to address issues anticipated to be raised in the dispositive motion.

WHEREFORE, in light of the agreement of movants it is requested that the Court grant Spain and Odyssey leave to file a motion and an opposition, respectively, of no more than 35 pages in length.

MEMORANDUM OF LAW

Local Rule 3.01(d) provides for the filing of motions seeking the leave requested by this motion. In this instance, it is in the benefit of justice to allow the additional length requested for the parties' submissions.

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 Plaintiff Odyssey Marine Exploration, concerning the substance of this motion, and that counsel agree on the resolution of same.

Respectfully submitted,

s/James A. Goold
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 10, 2008, I caused to be electronically filed the foregoing with the clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to Counsel of Record for Plaintiff Odyssey Marine Exploration and Conditional Claimant Republic of Peru.



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