

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
Tampa Division

2007 MAY 31 AM 10:41

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

ODYSSEY MARINE EXPLORATION, INC.

Plaintiff,

CIVIL ACTION

vs.

Case No.: 8:07-CIV-614-T-24MAP

The UNIDENTIFIED, SHIPWRECKED
VESSEL, its apparel, tackle,
appurtenances and cargo located within
center point coordinates:
(to be provided to the Court under seal)
in rem,

Defendant(s)

Verified Claim Of The Kingdom Of Spain

PLEASE TAKE NOTICE that, pursuant to Supplemental Admiralty Rule C(6), the Kingdom of Spain, by its undersigned counsel, with express reservation of all rights of sovereign immunity, submits this claim with respect to the vessel(s) and/or contents, artifacts, appurtenances and/or cargo that are or may become the subject of this proceeding.

As stated in the attached Notice, published by the United States Department of State in the Federal Register on February 5, 2004, the Kingdom of Spain has not abandoned its ownership and other rights in sunken vessels of the Kingdom of Spain, in vessels sunk while in the service of the Kingdom of Spain, and in cargo or other property of the Kingdom of Spain on or in sunken vessels. All sovereign and other rights in such vessels, cargo, artifacts or other contents have been reserved.

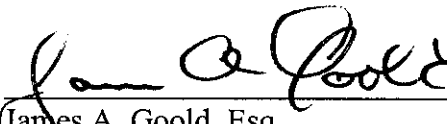
Odyssey Marine Exploration, Inc. v. The Unidentified Shipwrecked Vessel

Doc. 13

As further stated in the attached Notice, the Kingdom of Spain has not consented to and does not authorize or permit salvage of such vessels or property without express authorization by an authorized representative of the Kingdom of Spain.

By this Verified Claim, the Kingdom of Spain affirms and restates its sovereign and other rights in its vessels and cargo, the non-abandonment of such property and its refusal of salvage as to any and all such vessels and property by Claimant Odyssey Marine Exploration that are or may be the subject of this proceeding and in which the Kingdom of Spain has an interest. The Kingdom of Spain further affirms and restates that arrest, recovery or other unauthorized disturbance or recovery by Odyssey Marine Exploration of property of the Kingdom of Spain is not authorized and the Kingdom of Spain reserves all rights and remedies arising from such activities.

Nothing herein constitutes or may be construed as any waiver or limitation upon the sovereign immunity of the Kingdom of Spain and its property.


James A. Goold, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dated: 30 May 2007

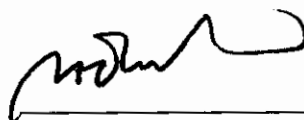
Counsel to the Kingdom of Spain
Telephone: (202) 662-5507
email: jgoold@cov.com
District of Columbia Bar #430315

Verification

I, Jorge Sobredo, am the Chief of the Cultural Office of the Embassy of Spain to the United States of America.

I have read the foregoing claim and know the contents thereof and declare under penalty of perjury that the same is true and correct to the best of my knowledge, information and belief.

Signed this 30 day of May, 2007, in Washington, D.C., U.S.A.

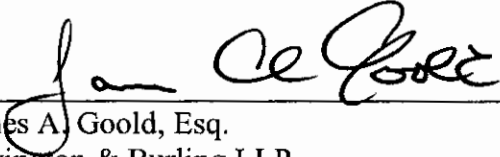
A handwritten signature in black ink, appearing to read 'Jorge Sobredo', written over a horizontal line.

Jorge Sobredo

CERTIFICATE OF SERVICE

I hereby certify that I caused the attached Verified Claim to be served up on the attorney of record for Plaintiff, Allan von Spiegelfeld, by facsimile and Express Mail delivery to:

Allen von Spiegelfeld
Fowler White Boggs Banker P.A.
501 East Kennedy Blvd., Suite 1700
Tampa, FL 33602



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