

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

ODYSSEY MARINE EXPLORATION, INC.

Plaintiff,

CIVIL ACTION

vs.

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

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).

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
KINGDOM OF SPAIN'S MOTION FOR MORE DEFINITE STATEMENT  
AND OTHER DISCLOSURE OR, IN THE ALTERNATIVE, TO DISMISS**

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 Definite Statement and Other Disclosure or, in the Alternative, to Dismiss (Docket #16) 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 Definite Statement and Other Disclosure or, in the Alternative, to Dismiss.
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 Definite Statement and Other Disclosure or, in the Alternative, to Dismiss.

**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  
Allen von Spiegelfeld – FBN 256803  
[avonsp@fowlerwhite.com](mailto:avonsp@fowlerwhite.com)  
Eric C. Thiel – FBN 016267  
[ethiel@fowlerwhite.com](mailto:ethiel@fowlerwhite.com)  
FOWLER WHITE BOGGS BANKER P.A.  
P.O. Box 1438  
Tampa, Florida 33601  
(813) 228-7411  
Facsimile: (813) 229-8313  
Attorneys for Plaintiff