

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
In Admiralty

ODYSSEY MARINE EXPLORATION, INC.,

Plaintiff,

vs.

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

THE UNIDENTIFIED SHIPWRECKED
VESSEL, etc.,

Defendant,
in rem

and

THE KINGDOM OF SPAIN, et al.,

Claimants.

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME
TO FILE OBJECTION TO REPORT AND RECOMMENDATIONS**

CLAIMANTS, Elsa D. Whitlock, f/k/a Elsa Dorca Ruiz, and Dr. Jaime Durand Palacios, move the Court to grant an extension of time within which they may filed objections to the Report and Recommendations and, in support, would show:

1. The instant *in rem* action arises from Plaintiff Odyssey's admiralty arrest of articles of salvage from a wreck site located in the Atlantic Ocean beyond the territorial waters of any country and the determination of rights to coins and artifacts recovered from the wreck site.

2. On June 3, 2009, Magistrate Mark A. Pizzo filed a Report and Recommendations in the case recommending that Spain's motion to dismiss (Doc. 131) and motion to vacate the arrest (Doc. 132) be granted and that Odyssey be directed to turn-over the *res* to the Kingdom of Spain.

3. Pursuant to the Notice to Parties, and under 28 U.S.C. §636(b)(1), aggrieved parties are to file written objections within 10 days from the date of service of the Report.

4. Because the Report and Recommendations is lengthy and because the issues are novel and complex, Claimants would like additional time to review the Report and respond accordingly.

5. Counsel for Claimants has contacted counsel for the Kingdom of Spain and he has communicated that Spain does not object to an extension of time for filing objections to the Report and Recommendations, with the understanding that the extension of time would not exceed the extension of time granted to Odyssey.

WHEREFORE, Claimants respectfully request that the Court grant them until July 6, 2009 to file their objections to the Report and Recommendations.

I HEREBY CERTIFY that a true and correct copy hereof was electronically filed with the Clerk of the Court via the CM/ECF system on this 11th day of June, 2009, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will generate and transmit Notices of Electronic Filing to all parties except Jose Antonio Rodriguez-Menendez, who is being served by United States Mail at 4611 South University Drive, Davie, FL 33328-3817, this same day.

/s/ Marlow V. White
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