

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

**IN ADMIRALTY**

ODYSSEY MARINE EXPLORATION, INC.,

Plaintiff,

v.

CASE NO: 8:07-cv-00614-T-23MAP

THE UNIDENTIFIED, SHIPWRECKED  
VESSEL,

Defendant,

KINGDOM OF SPAIN, et al.,

Claimants;

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**UNOPPOSED MOTION BY ODYSSEY MARINE EXPLORATION, INC.,  
FOR AN EXTENSION OF ALL PARTIES' TIME TO RESPOND  
TO THE REPORT AND RECOMMENDATION**

Plaintiff, Odyssey Marine Exploration, Inc. (“Odyssey”), by and through its undersigned counsel and under Rule 6(b) of the Federal Rules of Civil Procedure, moves the Court for an extension of time for all parties and claimants (collectively, the “parties”) to file objections to the Report and Recommendation (Doc. 209) to July 21, 2009, and for the Kingdom of Spain (“Spain”) to respond to the objections to August 31, 2009.

On June 3, 2009, Magistrate Judge Mark A. Pizzo filed a Report and Recommendation (the “R&R”) in this case. Pursuant to the Notice to Parties, and under 28 U.S.C. §636(b)(1), aggrieved parties were to file written objections within ten (10) days from the date of service of the report. Odyssey, joined by numerous claimants, requested and was

granted an extension of time until July 6, 2009, to submit objections to the R&R (Doc. 211). The remaining parties requested and were granted the same extension (Docs. 213, 218, 219, 223), with Spain being granted a similar extension to submit its response to objections to August 7, 2009, *see id.*

When requesting the original extension, the parties inadvertently did not take into consideration the effect of the Independence Day holiday and associated vacations. Although Odyssey has diligently been preparing its objections, because of the complexity of the pertinent record and the issues that need to be briefed, Odyssey, with the consent of all other parties as indicated in the Local Rule 3.01(g) certificate of counsel below, asks the Court (1) to extend further the deadline for objections to July 21, 2009, and (2) to extend further the deadline for Spain's response to objections to August 31, 2009.

WHEREFORE, Odyssey respectfully requests that the Court extend the time for all parties to file written objections to the R&R to July 21, 2009, and that Spain be permitted until August 31, 2009, to file a response.

**LOCAL RULE 3.01(g) CERTIFICATE OF COUNSEL**

Counsel for Odyssey has contacted counsel for all other parties and is authorized to represent to the Court that all parties support the relief requested in this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 30, 2009, I electronically filed this document with the Clerk of the Court by using the CM/ECF system and mailed a true and correct copy to non-CM/ECF participant Joseph A. Rodriguez, *pro se*, 4611 South University Drive, Davie, FL 33328-3817.

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