

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

ODYSSEY MARINE EXPLORATION, INC.	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
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;	:	
<i>in rem</i>	:	
and	:	
	:	
The Kingdom of Spain,	:	
	:	
Claimant.	:	
	:	
	:	//

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO KINGDOM OF SPAIN’S MEMORANDUM IN  
OPPOSITION TO MOTION FOR PROTECTIVE ORDER**

COMES NOW, Plaintiff, ODYSSEY MARINE EXPLORATION, INC. (“Odyssey”), by and through undersigned counsel, and moves this Honorable Court for an extension to reply to the KINGDOM OF SPAIN’s Memorandum in Opposition to Motion for Protective Order Regarding Preliminary Site Assessment (Docket #39) in this matter, and in support thereof would state:

1. ODYSSEY and the KINGDOM OF SPAIN have discussed this matter in detail and agree that an extension should be granted until October 22, 2007.

2. The reason for the extension is to allow ODYSSEY sufficient time to research and reply fully and completely to the complicated issues raised in the Kingdom of Spain's Memorandum in Opposition to Motion for Protective Order Regarding Preliminary Site Assessment.

WHEREFORE, in light of the KINGDOM OF SPAIN's agreement, it is requested that the Court permit ODYSSEY until October 22, 2007, to reply to the Memorandum in Opposition to Motion for Protective Order Regarding Preliminary Site Inspection.

**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 reply to the KINGDOM OF SPAIN's Memorandum in Opposition.

**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.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 3, 2007, I 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 James A. Goold, Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, DC 20004; and David C. Banker, Bush Ross P.A., 220 S. Franklin Street, P. O. Box 3913, Tampa, FL 33601, *Attorneys for Claimant, Kingdom of Spain.*

Respectfully submitted,

s/ Eric C. Thiel \_\_\_\_\_

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