

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 Motion to Dismiss Amended Complaint.

WHEREFORE, in light of the KINGDOM OF SPAIN's agreement, it is requested that the Court permit ODYSSEY until October 22, 2007, to respond to the Motion to Dismiss Amended Complaint.

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 to Dismiss.

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/ Eric C. Thiel

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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*.

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