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

ODYSSEY MARINE EXPLORATION, INC.	
Plaintiff,	CIVIL ACTION
v. THE UNDERWATER SITE AND RELATED UNIDENTIFIED SHIPWRECK, if any, its apparel, tackle appurtenances, and cargo located within a five mile radius	Case No: 8:07-CV-00614-SDM-MAP
of the center point coordinates provided to the Court under seal,	
Defendant. in rem	
and	
The Kingdom of Spain,	
Claimant.	; /:

## PLAINTIFF'S MOTION FOR ENTRY OF A PROTECTIVE ORDER

Plaintiff, Odyssey Marine Exploration, Inc. ("Odyssey"), by its undersigned counsel, hereby moves for entry of the attached Protective Order. As noted in the Certificate under Local Rule 3.01(g), counsel for the Parties have been unable to agree upon the exact language of a Protective Order. The attached order is that proposed by Odyssey.

The grounds supporting this Motion are set forth in the accompanying Memorandum of Law.

## CERTIFICATE UNDER LOCAL RULE 3.01(g)

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that he has conferred with counsel for Claimant, The Kingdom of Spain, in a good faith effort to resolve the issues by this Motion, and although counsel have made progress toward the language to be used in the Protective Order, the exact terms have not been agreed upon at the filing of this Motion.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 9, 2008, 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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