

CIVIL ACTION

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

## Dockets.Justia.com

counsel for said Plaintiff. In support of this motion, Plaintiff, ODYSSEY MARINE EXPLORATION, INC., states as follows:

1. K. Russell LaMotte, Esquire is a member in good standing of the Bar of the District of Columbia, the Bar of Pennsylvania (active non-resident status) and the United States District Court for the District of Columbia.

2. K. Russell LaMotte, Esquire certifies that he has not abused the privilege of appearing Pro Hac Vice in this Court, as defined by Local Rule 2.02(a).

3. K. Russell LaMotte, Esquire certifies that he understands that he will be governed by the Federal Rules of Civil Procedure and the Florida Rules of Professional Conduct, including Local Rule 2.04, as well as all the requirements and rules governing the professional behavior of members of the Florida Bar.

4. K. Russell LaMotte, Esquire is associated with the Law Firm of Beveridge & Diamond P.C., whose offices are located at 1350 I Street, N.W., Washington, D.C. 20005-3311, telephone number: (202) 789-6080, facsimile number: (202) 789-6190. His e-mail address is [rlamotte@bdlaw.com](mailto:rlamotte@bdlaw.com). Beveridge & Diamond P.C. serves in the capacity as Plaintiff, Odyssey Marine Exploration, Inc.'s co-counsel for purposes of this litigation and other related matters.

5. The Law Firm of Fowler White Boggs Banker P.A. has been designated by the Plaintiff as local counsel with full consent to act on their behalf in this matter.

6. An Affidavit setting forth Mr. LaMotte's qualifications to appear before this Court is attached hereto as Exhibit A.

WHEREFORE, Plaintiff, Odyssey Marine Exploration, Inc., respectfully requests this Court to enter an order authorizing and granting leave to K. Russell LaMotte, Esquire to appear Pro Hac Vice and participate in this case as co-counsel for this Plaintiff.

Respectfully submitted,



Allen von Spiegel – FBN 256803  
avonsp@fowlerwhite.com  
Eric C. Thiel – FBN 016267  
ethiel@fowlerwhite.com  
FOWLER WHITE BOGGS BANKER P.A.  
P.O. Box 1438  
Tampa, Florida 33601  
(813) 228-7411  
Facsimile: (813) 229-8313

s/ Melinda J. MacConnel  
Melinda J. MacConnel – FBN 871151  
Odyssey Marine Exploration, Inc.  
5215 West Laurel Street  
Tampa, FL 33607  
(813) 876-1776, ext. 2240  
Fax: (813) 830-6609  
E-mail: mmacconnel@shipwreck.net  
Attorneys for Plaintiff

**CERTIFICATE UNDER LOCAL RULE 3.01(g)**

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that he has conferred with opposing counsel in a good faith effort to resolve the issues by this Motion, and counsel agree on the resolution of the same.

s/ Allen von Spiegelfeld  
Allen von Spiegelfeld – FBN 256803  
avonsp@fowlerwhite.com  
Eric C. Thiel – FBN 016267  
ethiel@fowlerwhite.com  
FOWLER WHITE BOGGS BANKER P.A.  
P.O. Box 1438  
Tampa, Florida 33601  
(813) 228-7411  
Facsimile: (813) 229-8313

s/ Melinda J. MacConnel  
Melinda J. MacConnel – FBN 871151  
Odyssey Marine Exploration, Inc.  
5215 West Laurel Street  
Tampa, FL 33607  
(813) 876-1776, ext. 2240  
Fax: (813) 830-6609  
E-mail: mmacconnel@shipwreck.net  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 3, 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.*

s/ Allen von Spiegelfeld

Allen von Spiegelfeld – FBN 256803

avonsp@fowlerwhite.com

Eric C. Thiel – FBN 016267

ethiel@fowlerwhite.com

FOWLER WHITE BOGGS BANKER P.A.

P.O. Box 1438

Tampa, Florida 33601

(813) 228-7411

Facsimile: (813) 229-8313

s/ Melinda J. MacConnel

Melinda J. MacConnel – FBN 871151

Odyssey Marine Exploration, Inc.

5215 West Laurel Street

Tampa, FL 33607

(813) 876-1776, ext. 2240

Fax: (813) 830-6609

E-mail: mmacconnel@shipwreck.net

Attorneys for Plaintiff