

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

ODYSSEY MARINE EXPLORATION, INC.

Plaintiff,

CIVIL ACTION

vs.

Case No.: 8:07-CV-00616-JSM-MSS

THE UNIDENTIFIED, SHIPWRECKED
VESSEL, its apparel, tackle, appurtenances,
and cargo located within center point
coordinates: (to be provided to the Court
under seal), *in rem*,

Defendant(s).

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
COMPLETED CASE MANAGEMENT REPORT**

COMES NOW, Plaintiff, ODYSSEY MARINE EXPLORATION, INC., and Claimant KINGDOM OF SPAIN, by and through undersigned counsel, and respectfully moves this Honorable Court to allow the parties to submit a completed Case Management Report thirty (30) days after the filing of the Amended Complaint, which is to be filed no later than August 6, 2007, by Odyssey Marine Exploration, Inc., and in support thereof would state:

1. The parties have met in compliance with Rule 3.05.
2. During the meeting, it became apparent that the parties would be in a better position to prepare a completed Case Management Report if they waited until after the Amended Complaint is filed on or before August 6, 2007.
3. The parties have agreed that settlement is unlikely; the parties do not agree to binding arbitration; the parties do not consent to jurisdiction by a magistrate judge, and the parties do request a preliminary pretrial conference.

4. The parties will address discovery and the discovery schedule in the Case Management Report to be filed within 30 days after the Amended Complaint is filed.

MEMORANDUM OF LAW

Rule 1.01 of the Local Rules of Civil Procedure provide that any time frame set by the Court or by the Rules can be modified if it is in the best interest of judicial economy and justice. The parties have conferred and have agreed it is clearly in the best interest of both judicial economy and justice to allow the parties thirty (30) from the time of the filing of the Amended Complaint to complete the Case Management Report. If the parties do not have that extra period of time, it may be necessary to amend the Case Management Report simply because new issues have developed.

WHEREFORE, the parties respectfully request this Honorable Court to grant the parties thirty (30) days from the filing of the Amended Complaint in which to comply with Rule 3.05 of the Local Rules of Civil Procedure and prepare a Case Management Report pursuant to the Court's Rules.

Respectfully submitted,

s/ Allen von Spiegelfeld

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