

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).

**SECOND 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 from today's date, and in support thereof would state:

1. The parties have met again in compliance with Rule 3.05.
2. During the meeting, we discussed the possibility of filing the Case Management Report on September 6, 2007, however, noted that the KINGDOM OF SPAIN is not required to file their Answer until September 19, 2007.
3. Until a responsive pleading is filed by SPAIN, it is not really practical to file a Case Management Report since all of the issues not at this time known.

4. This matter involves a large number of intricate issues, including such things as sovereign immunity, the law of the sea conventions, international treaties, and foreign statutes, which have made the pleadings difficult and time-consuming.

5. Since the last Joint Motion for Extension of Time to File Completed Case Management Report (Dkt. 22) was filed, all three cases have been brought before one judge, and the parties have been working together to expedite the proceedings.

6. The requested extension of time will not appreciably delay the scheduling of events in this case.

MEMORANDUM OF LAW

Rule 1.01 of the Local Rules of Civil Procedure provides 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 that it is clearly in the best interest of both judicial economy and justice to allow the parties an additional thirty (30) days from September 6, 2007, to complete the Case Management Report. If the parties do not have the extra period of time, then the Case Management Report will be, at best, incomplete and perhaps in error.

WHEREFORE, the parties respectfully request this Honorable Court to grant the parties an additional thirty (30) days from September 6, 2007, 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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- and -

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