

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

ODYSSEY MARINE EXPLORATION, INC.	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	Case No: 8:07-CV-00616-T-23MAP
	:	
THE UNIDENTIFIED, SHIPWRECKED VESSEL,	:	
if any, its apparel, tackle, appurtenances and	:	
cargo located within a five mile radius of the	:	
center point coordinates provided to the Court	:	
under seal,	:	
	:	
Defendant;	:	

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
KINGDOM OF SPAIN’S MOTION TO DISMISS AMENDED COMPLAINT**

COMES NOW, Plaintiff, ODYSSEY MARINE EXPLORATION, INC. (“Odyssey”),  
by and through undersigned counsel, and moves this Honorable Court for an extension to  
respond to the KINGDOM OF SPAIN’s Motion to Dismiss Amended Complaint (Docket  
#41) in this matter, and in support thereof would state:

1. ODYSSEY and the KINGDOM OF SPAIN have discussed this matter in detail and have agreed that an extension should be granted until October 22, 2007.
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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Attorneys for Plaintiff

**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.*

s/ Eric C. Thiel

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