

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN ADMIRALTY

ODYSSEY MARINE EXPLORATION,
INC.,

Plaintiff.

vs.

THE UNIDENTIFIED, SHIPWRECKED
VESSEL, its apparel, tackle, appurtenances
and cargo located within a 5 mile radius of the
center-point coordinates to be provided under
seal at the Court's request, *in rem*,

CASE NO. 8:08-cv-01045-RAL-MAP

Defendant.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
CLAIM AND ANSWER**

COMES NOW Claimant, Ministry of Defence for the United Kingdom, by and through its undersigned counsel, pursuant to Rule 6(b)(1)(A) and requests an extension of time of 60 days, up to and including July 9, 2009 within which to file a Verified Statement of Right or Interest required by Supplemental Rule C(6)(a)(i)(a) and Local Rule 7.03(f)(1), followed by the usual 20 days to file the Answer required by Supplemental Rule C(6)(a)(iv) and Local Rule 7.03(f)(2), on the grounds that the parties are in current negotiations toward an agreement, which if successful will significantly reduce the issues to be resolved by this court.

RULE 3.01(g) CERTIFICATE

I HEREBY CERTIFY, that prior to filing this motion, I consulted with counsel for plaintiff, Odyssey Marine Exploration, Inc., regarding the relief requested, and plaintiff, through its counsel, has consented to granting the extension of time requested.

WHEREFORE, Claimant, Ministry of Defence of the United Kingdom, requests entry of an Order extending the time for filing a Verified Statement of Right or Interest for 60 days, up to and including July 9, 2009.

Respectfully submitted,

/s/ Timothy P. Shusta _____
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Attorneys for Ministry of Defence, United
Kingdom

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to the following counsel for plaintiff:

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/s/ Timothy P. Shusta _____
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