

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.

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**SECOND 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 up to and including September 30, 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 have been involved in, and are continuing negotiations, which if successful will significantly reduce and potentially resolve the issues to be decided 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 up to and including September 30, 2009, followed by 20 days within which to file an answer.

Respectfully submitted,

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

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically filed with the Clerk of Court via CM/ECF system on July 8, 2009, which will generate and transmit Notices of Electronic Filing generated by the CM/ECF system to all counsel of record.

/s/ Timothy P. Shusta \_\_\_\_\_  
Timothy P. Shusta