

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE/OPELOUSAS DIVISION**

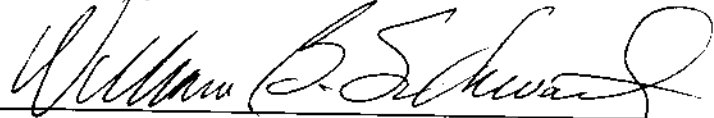
JERAMIE and DAPHNE BROWN	*	CIVIL ACTION
VERSUS	*	NO. 04-1486
SEA MAR MANAGEMENT, L.L.C.	*	
et al	*	SECTION L-0
	*	JUDGE DOHERTY
	*	MAG. JUDGE HILL

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**RESPONSE OF OFFSHORE OIL SERVICES  
TO STATEMENT OF FACTS BY SEA MAR MANAGEMENT**

- 1) It is admitted that Sea Mar Management, Inc. entered into a Master Time Charter Agreement with Offshore Oil Services, Inc. The remainder of the facts as submitted by Sea Mar Management regarding its status as a limited liability company rather than a corporation and the statement that Offshore Oil Services, Inc. agreed to defend, indemnify and hold harmless Sea Mar are contested since they have not been proven by pleadings, discovery, or affidavits submitted in support of the Motion filed by Sea Mar.
  
- 2) It is admitted that the Master Time Charter Agreement entered into by Sea Mar Management, Inc. and Offshore Oil Services, Inc. was in full force and effect on July 21, 2003.
  
- 3) It is admitted that Offshore Oil Services, Inc agreed to time charter the vessel M/V CAPE COOK from Sea Mar Management, Inc. on March 6, 2002.
  
- 4) Based on the pleadings and discovery, it is admitted that Jeramie Brown was employed by L&L Sandblasting, Inc. The remainder of the facts as submitted by Sea Mar Management regarding the transfer activity, the platform involved and the job status of Jeramie Brown as a sandblaster are contested since they have not been proven by pleadings, discovery, or affidavits submitted in support of the Motion filed by Sea Mar.

Respectfully submitted:



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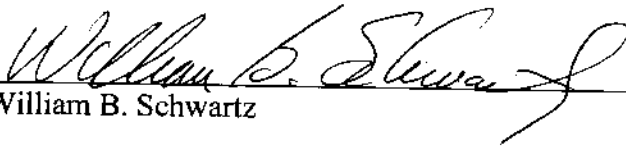
and (158623)

BURKE & MAYER, Of Counsel

Attorneys for Offshore Oil Services, Inc.

**CERTIFICATE**

I certify that a copy of the above and foregoing pleading has been served on all counsel of record by depositing same in the U.S. Mail, postage pre-paid, this 12<sup>th</sup> day of December, 2005.



William B. Schwartz