

**FOR THE WESTERN DISTRICT OF MICHIGAN**  
**Northern Division**

GREAT LAKES EXPLORATION	)	
GROUP LLC	)	
Plaintiff,	)	
v.	)	Civil Action No. 1:04-CV-375
	)	
The Unidentified, Wrecked and (For Salvage-	)	HON. ROBERT HOLMES BELL
Right Purposes), Abandoned Sailing Vessel, etc.	)	
Defendant, et al.	)	

**SECOND SUPPLEMENTARY DECLARATION OF STEVEN J. LIBERT IN**  
**RESPONSE TO JULY 20, 2006 SHOW CAUSE ORDER**

State of Maryland } ss:  
 County of Montgomery }

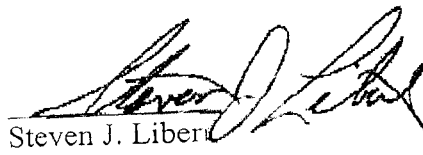
Steven J. Libert, after first being duly sworn, deposes and states as follows:

1. I make this Second Supplementary Declaration in further response to the Court's Order to Show Cause dated July 20, 2006.
2. On at least 6 different occasions, I have offered to John Halsey and/or Wayne Lusardi to take them or another representative on behalf of the State of Michigan to the site of the "large wooden beam" mentioned in the Court's Show Cause Order, provided that the State agree (1) that such information would be kept the confidential information of Great Lakes Exploration and not treated as information subject to public release under the Michigan Freedom of Information Act, and (2) not utilize such information to claim that the State of Michigan is in "actual possession" of the artifact or shipwreck.
3. As of the date of this Second Supplementary Affidavit, Intervenors have not expressed any interest in proceeding with such an inspection.

4. Great Lakes Exploration remains ready, willing and able to assist in such an inspection.

FURTHER AFFIANT SAYETH NAUGHT.

I, Stephen J. Libert, declare under penalty of perjury that I have read the foregoing Affidavit and that it is true to the best of my knowledge and belief.

  
Steven J. Libert