

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
Northern Division**

GREAT LAKES EXPLORATION )  
GROUP LLC )

Plaintiff, )

v. )

The Unidentified, Wrecked and (For )  
Salvage-Right Purposes), Abandoned )  
Sailing Vessel, her tackle, )  
apparel, appurtenances, cargo, etc. )  
located within a circle having )  
a radius of 3.5 statute miles, whose )  
center point is at coordinates )  
45° 32.8' North latitude and 86° 41 5' )  
West longitude, )

*In Rem* )

Defendant, )

Civil Action No. 1:04-CV-375

HON. ROBERT HOLMES BELL

**INTERVENORS' STATEMENT OF  
RIGHTS AND INTEREST**

v.

STATE OF MICHIGAN DEPARTMENT  
OF HISTORY, ARTS, AND LIBRARIES  
AND MICHIGAN DEPARTMENT OF  
ENVIRONMENTAL QUALITY,

Intervenors.

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Roger W. Boer  
Roger W. Boer, LLC  
600 Waters Building  
161 Ottawa Avenue NW  
Grand Rapids, MI 49503  
616/235-3500

James R. Piggush  
Assistant Attorney General  
Environment, Natural Resources,  
and Agriculture Division  
P.O. Box 30755  
Lansing, MI 48909  
517/373-7540

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**INTERVENORS' STATEMENT OF RIGHTS AND INTERESTS**

Restricting their appearance to the defense of this in rem claim against the Defendant Unidentified, Wrecked and (for salvage-right purposes) abandoned sailing vessel, her tackle, apparel, appurtenances, cargo, etc, believed to be the Griffin, etc, Intervenors, Michigan Department of History, Arts and Libraries (DHAL) and Michigan Department of Environmental Quality (MDEQ), the agencies of the State of Michigan charged with the administration of MCL 324.76101, et seq, now state, on behalf of the State of Michigan, that for all times pertinent to the present action the State of Michigan claims ownership of the alleged defendant ship-wrecked vessel, her tackle, apparel, appurtenances, cargo, etc. and of all items removed from said defendant; claims a right to possess the defendant and any item(s) removed from the Defendant superior to any right of the Plaintiff or any other person, and claims the exclusive right to explore, survey, excavate and regulate the defendant Unidentified, Wrecked and (for salvage-right purposes) abandoned sailing vessel, her tackle, apparel, appurtenances, cargo, etc, believed to be the Griffin, etc.,

Intervenors further state that on account of the State of Michigan's ownership of the Defendant Unidentified, Wrecked and (for salvage-right purposes) abandoned sailing vessel, her

tackle, apparel, appurtenances, cargo, etc, believed to be the Griffin, etc, the Court lacks admiralty jurisdiction in rem over Plaintiff's claim.

Respectfully submitted,

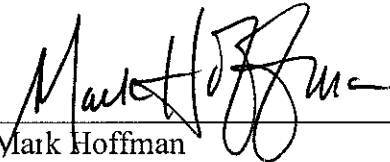
Michael A. Cox  
Attorney General

/s/

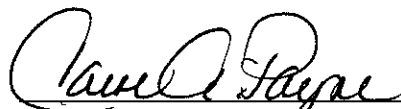
James R. Piggush (P29221)  
Assistant Attorney General  
Environment, Natural Resources  
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P.O. Box 30755  
Lansing, MI 48909  
517/373-7540

Dated: July 22, 2008

I, Mark Hoffman, having been duly sworn, state that I am the Deputy Director of the Michigan Department of History, Arts and Libraries and that I have read the above claim and that it is true to the best of my knowledge and belief.

  
\_\_\_\_\_  
Mark Hoffman

The foregoing was subscribed and sworn to before me this 22nd day of July, 2008.

  
\_\_\_\_\_  
Notary Public State of Michigan  
Ingham County  
Acting in: Ingham County  
My Commission Expires: 12/19/08