

**IN THE UNITED STATES DISTRICT COURT
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- Right Purposes), Abandoned Sailing Vessel, etc. |) | HON. ROBERT HOLMES BELL |
| Defendant, et al. |) | |

**PLAINTIFF GREAT LAKES EXPLORATION'S STATUS REPORT ON
PLAINTIFF'S DISCOVERY AND MOTIONS**

Plaintiff Great Lakes Exploration, LLC, by counsel, respectfully files this Status Report on Discovery and Motions.

1. On or about November 13, 2008, Plaintiff served the attached discovery on Claimants.
2. Answers to the discovery are needed for three separate purposes: (1) to assist Plaintiff in opposing the Claimants' proposed motion for summary judgment; (2) to assist Plaintiff in conducting further discovery to oppose the proposed motion (including depositions, requests for admissions, supplementary interrogatories and supplementary requests for production); and (3) to allow Plaintiff to satisfy its obligations under Fed. R. Civ. P. 11 with respect to filing one or more motions of its own.
3. Claimants have requested an enlargement of time to respond to the pending discovery. Plaintiff has agreed to this enlargement, consistent with the spirit of cooperation among counsel which is a key element of federal discovery practice and procedure.

4. The condition precedent of Plaintiff's agreement to an enlargement has been the Claimants' agreement that the enlargement does not waive any of Plaintiff's rights or remedies as to any matter in this proceeding or reflect any lack of due diligence by Plaintiff. Claimants have agreed to this condition.

5. Plaintiff expects to file its motion within 14 days, more or less, after it has received full and complete answers to its pending discovery.

Respectfully submitted,

/s/ Richard T. Robol
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December, 2008, a copy of the foregoing was served by electronic mail upon counsel for Claimants and by regular mail, U.S., postage prepaid.

/s/ Richard T. Robol