

**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 SUPPLEMENTAL  
INTERROGATORIES TO CLAIMANTS**

Pursuant to Fed. R. Civ. P. 33, Plaintiff Great Lakes Exploration, LLC, by counsel, propounds the following Supplemental Interrogatories to Claimants: to be answered fully and in writing and under oath<sup>1</sup>, within thirty (30) days of the service hereof, and to be produced at the office of counsel for Plaintiff, 433 West Sixth Avenue, Columbus, OH 43201.

1. As to each inspection of the site of the Defendant conducted by or on behalf of Claimants, please state the date(s) of each site inspection; the name and Coast Guard Registration number of each vessel participating in the site inspection; the nature of the site inspection; the owner of each participating vessel; the length of time spent by the vessel (s) at each portion of the *in rem* Defendant to the nearest minute; and a description of all archaeological and other analysis of the site conducted.

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<sup>1</sup>/ The attached Instructions and Definitions are incorporated herein by reference.

2. Please state the name, address and employer of each person who participated in the voyage, identifying the name, address and employer of each person on any vessel that went to the site of the *in rem* Defendant

3. Please state the name, job title, employer, and number of years of service with Claimant of each person who was present on the voyage; and the work performed by each such person with respect to the inspection.

3. As to each such site inspection please describe by type, make and model number all equipment used to determine the location of the shipwreck site and/or any anomaly on the shipwreck site, identifying the name, job title and address of each person who used or had access to such equipment.

Respectfully submitted,

/s/ Richard T. Robol  
Richard T. Robol (0064345)  
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Attorneys for Plaintiff  
Great Lakes Exploration, LLC

### **DEFINITIONS**

1. As used herein, the word "document" or "documents" means any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides thereof, and including, but not limited to, papers, books, accounts, letters, photographs, objects, correspondence, telegrams, cables, telex messages, memoranda, notes, notations,

work papers, transcripts, affidavits, minutes or reports of telephone or other conversations, or of interviews, or of conferences, or of meetings, inter- or intra-office communications, inter- or intra-departmental communications, inter - or intra-company communications, resolutions, certificates, opinions, reports, studies, analyses, evaluations, contracts, licenses, agreements, ledgers, journals, books or records of accounts, summaries of accounts, balance sheets, interim statements, budgets, receipts, invoices, desk calendars, appointment books, diaries, lists, e-mails, web sites, tabulations, summaries, sound recordings, computer tapes, magnetic tapes, microfilms, punch cards, computer records; e-mails; web sites; and all other records kept by electronic, photographic, xerographic, or other mechanical means, and anything similar to any of the foregoing.

2. As used herein, a request to "identify" a document shall be deemed a request to furnish a description of the document, including its subject matter, the names of the parties who prepared and received it, its date, and any identifying number or code, and to furnish the name of the present custodian of the document and the date that the present custodian of the document obtained possession of the document. In lieu of identifying a document in the detail requested, a copy of the document may be attached to the answers of these Interrogatories, provided that any of the aforementioned identifying information not appearing on the face of the document is specifically stated in the answers.

3. As used herein, a request to "identify" a natural person shall be deemed a request for that person's name, current home address and telephone number, and the name, address and telephone number of that person's current employer or business.

4. As used herein, a request to "identify" an employer, business, organization, or other entity shall be deemed a request for its name, address, and telephone number.

5. As used herein, the term "describe" means describe fully by reference to the underlying facts and particularize as to date, place, and the identity of the persons involved.

6. As used herein, the terms "you," "your," and "Claimant" shall refer, in context, to the Claimants and any of the Claimant's attorneys, investigators, agents, representatives, or any person acting in cooperation or in concert with Claimant or any of them.

7. These discovery requests should be construed to request the broadest scope of information, disclosures and documents permitted by the Federal Rules of Civil Procedure.

8. If you claim a privilege as to any information or document requested, please provide a privilege log in compliance with the Federal Rules of Civil Procedure and Local Rules of Court.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of November, 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 \_\_\_\_\_  
Of Counsel