

**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.	)	

**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION OF PLAINTIFF  
GREAT LAKES EXPLORATION FOR 14 DAY ENLARGEMENT OF TIME TO  
RESPOND TO INTERVENORS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff Great Lakes Exploration, LLC, by counsel, respectfully moves the Court to enlarge its time for filing its response to the Intervenor's Motion for Summary Judgment from January 21, 2009 through and including February 4, 2009.

The Intervenor filed their Motion for Summary Judgment on December 23, 2009. Due to the intervening Christmas and New Year's holidays, several witness and counsel were unavailable. Compounding the delay, during the second week of January, counsel for Plaintiff was unexpectedly ordered to report for Army Reserve duty at the U.S. Joint Forces Command in Norfolk, Virginia. Counsel has just recently returned from his military obligation and requires an additional 14 days to file Plaintiff's response.

Moreover, because the motion filed by the Intervenor is a dispositive motion, it is important that the Court's analysis of the issues be informed by the best efforts of the parties.

Finally, a brief enlargement of time would not prejudice any party.

The Intervenor has consented to this Motion.

Respectfully submitted,

/s/ Richard T. Robol  
Richard T. Robol (0064345)  
ROBOL LAW OFFICE, LLC  
433 West Sixth Avenue  
Columbus, Ohio 43201  
(614) 737-3739  
(614) 737-3756 (Facsimile)  
Attorneys for Plaintiff  
Great Lakes Exploration, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of January, 2009, 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