

**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	)	HON. ROBERT HOLMES BELL
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'	)	<b><u>STIPULATED MOTION TO</u></b>
West longitude,	)	<b><u>ADJOURN HEARING ON</u></b>
	)	<b><u>INTERVENORS' MOTION FOR</u></b>
<i>In Rem</i>	)	<b><u>SUMMARY JUDGMENT</u></b>
Defendant,	)	
v.	)	
	)	
STATE OF MICHIGAN DEPARTMENT	)	
OF HISTORY, ARTS, AND LIBRARIES	)	
AND MICHIGAN DEPARTMENT OF	)	
ENVIRONMENTAL QUALITY,	)	
	)	
Intervenors.	)	

**STIPULATED MOTION TO ADJOURN HEARING ON INTERVENORS' MOTION  
FOR SUMMARY JUDGMENT**

In December, 2008, Intervenors filed their motion seeking dismissal of this action pursuant to Fed. R. Civ. P. Rule 56. Since the filing of the motion for summary judgment the Republic of France has filed a claim of ownership. The State of Michigan and France have had preliminary discussions regarding possible settlement of the issue of ownership of the Defendant Shipwreck. Also, the State, France and Plaintiff Great Lakes Exploration Group, LLC (GLEG) have exchanged drafts of a proposal to conduct a phase II investigation of the Defendant

Shipwreck for the purpose of determining its identity, a necessary step if this litigation is going to proceed to a determination of the ownership of the Defendant. For these reasons, all Parties believe it would be in everyone's interest to postpone the hearing on Intervenors' motion for summary judgment to allow these discussions to progress to a resolution.

The hearing on this motion was originally set for April 9, 2009 and at Intervenors' request, the Court rescheduled it to June 25, 2009 to give the parties time to reach agreement on some of the necessary issues. Real progress has been made in that direction and if these negotiations are successful, some or all of the issues raised by Intervenors' motion and by this litigation could be resolved without the necessity of a determination by this Court.

In addition, counsel for the Republic of France and GLEG respectfully states that several days ago he was unexpectedly advised that he is being ordered to report for U.S. Army Reserve duty at Ft. Benning, Georgia, commencing on or about June 26, 2009, and that the task of preparing to report for this assignment may hamper the ability of counsel for the parties in their continuing negotiations concerning a phase II investigation agreement.

**RELIEF REQUESTED**

All Parties respectfully request that the hearing on Intervenors' motion for summary judgment currently scheduled for June 25, 2009, be postponed to a date to be set after Intervenors apply to the Court for the setting of a hearing date.

Respectfully submitted,

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Attorney General

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Attorneys for Plaintiff  
Great Lakes Exploration, LLC and  
The Republic of France

Dated: June 17, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2009, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the counsel.

/s/ Louis B. Reinwasser

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