

**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')	<u>STIPULATED MOTION TO</u>
West longitude,)	<u>ADJOURN HEARING ON</u>
)	<u>INTERVENORS' MOTION FOR</u>
<i>In Rem</i>)	<u>SUMMARY JUDGMENT</u>
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. All Parties are in agreement that for the moment the issue of ownership should continue to be put on hold to give the Parties the chance to conduct the necessary investigation to determine the true identity of the Defendant wreck. The identity of the wreck could have a significant impact on the future course of this litigation.

To this end, the Parties have exchanged drafts of proposals to conduct a phase II investigation of the Defendant Shipwreck for the purpose of determining its identity. The Parties have reached preliminary agreement on several of the substantive issues of the phase II agreement, but are still negotiating in good faith on a couple critical provisions, including concerning the ownership and use of intellectual property. The Parties believe these issues can be worked out and that it would be in everyone's interest to again postpone (the Court has graciously granted the Parties' prior requests for postponement) the hearing on Intervenors' motion for summary judgment to allow these discussions to progress to a resolution. This hearing is currently scheduled for October 15, 2009.

RELIEF REQUESTED

All Parties respectfully request that the hearing on Intervenors' motion for summary judgment currently scheduled for October 15, 2009, be postponed for two or three months to give the Parties additional time to reach agreement regarding the phase II investigation.

Respectfully submitted,

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Attorney General

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Great Lakes Exploration, LLC and
The Republic of France

Dated: September 15, 2009

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 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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