

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
Northern Division

GREAT LAKES EXPLORATION  
GROUP LLC

Plaintiff

Civil Action No. 1:04-CV-375

v.

HON. ROBERT HOLMES BELL

The Unidentified, Wrecked and (For  
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' West longitude,

**STIPULATION**

*In Rem*

Defendant.

and

MICHIGAN DEPARTMENT OF HISTORY,  
ARTS AND LIBRARIES AND MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL  
QUALITY,

Intervening Defendants

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Richard Thomas Robol  
Robol & Winkler LLC  
555 City Park Avenue  
Columbus, OH 43215  
614/559-3846

Roger W. Boer  
Roger W. Boer, LLC  
161 Ottawa Avenue, NW  
Grand Rapids, MI 49503  
616/235-3500

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James R. Piggush  
Assistant Attorney General  
Environment, Natural Resources,  
and Agriculture Division  
P.O. Box 30755  
Lansing, MI 48909  
517/373-7540

**STIPULATION**

Whereas Plaintiff has served discovery requests to which responses are due on December 30, a state holiday, and Christmas holidays will occur during the previous week as well, and

Whereas Plaintiff intends to refer to those responses in its response to Intervenors' Motion to Dismiss, which is currently due on December 18, 2004, although Intervenors do not acknowledge that those discovery requests have relevance to the pending motion,

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and the Intervenors, through their respective counsel of record, to extend the following deadlines, as follows:

Intervenors may have until January 13, 2005 to prepare their response to the pending discovery requests.

Plaintiff may have until January 27 to complete their response to Intervenors' motion.

The parties agree that the Court may enter the attached Order without further notice to any party.

Dated: December 10, 2004

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/S/  
Richard Thomas Robol  
Robol & Winkler LLC  
Attorney for Great Lakes Exploration

Dated: December 10, 2004

\_\_\_\_\_  
/S/  
Roger W. Boer  
Roger W. Boer, LLC  
Attorney for Great Lakes Exploration

Dated: December 10, 2004

\_\_\_\_\_  
/S/  
James R. Piggush  
Assistant Attorney General  
Attorney for Intervenors