

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

FILED JUN -7 AM 9:48

U.S. DISTRICT COURT
WESTERN DISTRICT MICH
BY [Signature]

GREAT LAKES EXPLORATION GROUP LLC
Plaintiff,
v.
The Unidentified, Wrecked and Abandoned Sailing Vessel, her engines, 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,
In Rem
Defendant.

Civil Action No. 1:04 CV 0375
Robert Holmes Bell
Chief, U.S. District Judge

MOTION FOR IN CAMERA HEARING AND SUPPORTING BRIEF

COMES NOW Plaintiff, Great Lakes Exploration Group LLC, by counsel, and for its motion for an in camera hearing herein respectfully states as follows:

- 1. Plaintiff is in the process of conducting recovery of the Defendant shipwreck which is the subject of this suit.
2. Plaintiff desires to keep the Court fully informed as to the details, nature and extent of such recovery operations.
3. Plaintiff desires to arrange with the Court a pre-arrest hearing pursuant to Supplemental Rule C (3), Fed. R. Civ. Proc.

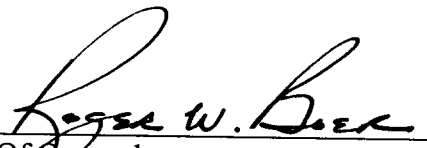
4. Much of the information to be divulged to the Court is confidential, proprietary, trade secret information and/or otherwise in need of protection from public disclosure.

5. Public disclosure of such information would result in substantial loss of proprietary rights of the Plaintiff, would potentially interfere with Plaintiff's conduct of recovery operations, and could have potentially adverse consequences for the safety of life and property at sea.

Accordingly, Plaintiff prays this Court to allow the disclosure *in camera* of the details of Plaintiff's recovery operations.

Respectfully submitted,  
GREAT LAKES EXPLORATION GROUP LLC

By:   
Of Counsel  
Richard T. Robol (OH- 0064345)  
ROBOL & WINKLER LLC  
555 City Park Avenue  
Columbus, Oh 43215  
Telephone: (614) 559-3839  
Facsimile: (614) 559-3846  
[rrobol@columbuscounsel.com](mailto:rrobol@columbuscounsel.com)

  
Of Counsel  
Roger Boer, Esq.  
161 Ottawa Avenue N.W.  
Suite 600  
Grand Rapids, MI 49503  
Telephone: (616) 233-5136  
Facsimile: (616) 459-5102

**ATTORNEYS FOR PLAINTIFFS**