

**EXHIBIT 4**

**REQUEST NO. 35**

Admit that in or about July, 2004, John Halsey publicly stated in reference to Great Lakes Exploration's Complaint in this case that if the Defendant shipwreck is *The Griffin*, then the French government "would trump all other claimants," or words to that effect.

**RESPONSE:**

Once again, the attributed statement appears to be based upon the Ed White article.

Intervenors object to this request for lack of relevance to these proceedings for the reasons stated in response to Request No. 20, and also because Mr. Halsey lacks authority to determine who has a superior claim to Michigan property.

Intervenors deny this request for the reasons that no such statement was made in reference to Great Lakes Exploration's complaint in this case, which makes no reference to that ship, but only in reference to and in reliance upon independent representations made to Mr. Halsey by Mr. Steve Libert indicating that Mr. Libert had discovered a vessel and had evidence that it was *The Griffin*, and in reference to and in reliance upon the mistaken belief that the Republic of France would come forward with evidence demonstrating that the vessel in question was a ship of state. In July, 2004, Mr. Halsey had not yet had any opportunity to investigate the difference between *The Griffin* and the *LaBelle*, a vessel that belonged to the King of France, or to consult with counsel concerning these issues. The statement that if the shipwreck "is *The Griffin*, then the French government 'would trump all other claimants,' or words to that effect," is specifically denied, *The Griffin* having been a private vessel in which the government of France had no ownership interest.