

**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')	
West longitude,)	
)	
<i>In Rem</i>)	
)	
Defendant.)	

MOTION TO ENTER PROTECTIVE ORDER

Pursuant to W.D. Mich. L.Civ. R. 10(a), Plaintiff Great Lakes Exploration respectfully moves the Court to enter a Protective Order in a form as attached as Exhibit

1. In support of this Motion, Plaintiff states:

1. Pursuant to the Court's Order dated May 10, 2005, Plaintiff Great Lakes Exploration Group and the Field Museum of Chicago have assembled, and are prepared to provide forthwith to Intervenor, details regarding the shipwreck which is the subject of this proceeding, subject to entry of a Protective Order.
2. The documents and information to be provided to Intervenor include trade secrets and other confidential information (the "trade secrets").

3. The trade secrets have been developed at an expense of hundreds of thousands of dollars, utilizing hundreds of hours of research and development, hard work, investigation, and analysis.
4. The trade secrets have been consistently treated as confidential by Defendant and the Field Museum, are valuable, and could be used by others to damage Great Lakes Exploration and the Field Museum in their efforts and business. In addition, disclosure of this information could result in damage to the shipwreck site which is the subject of this proceeding.
5. Over the course of more than a month, Great Lakes Exploration has attempted to obtain Intervenor's consent to an agreed Protective Order with the following key features:
 - (a) permitting the prompt disclosure of such information to the Court and to Intervenor;
 - (b) preventing Intervenor from misappropriating and using such trade secrets for their own purposes (or for those of any third party), other than in connection with the pending Motion to Dismiss;
 - (c) ensuring effective, enforceable, safeguards to prevent fraudulent claims of "independent" development of such trade secrets; and
 - (d) providing for sanctions, including contempt and liquidated damages, in the event that Intervenor decide to violate the Protective Order at some time in the future.
6. As of the date of this Motion, the efforts of Great Lakes Exploration to obtain an Agreed Protective Order have been unsuccessful.

7. Plaintiff has attached a proposed Protective Order as an Exhibit to this Motion.

Accordingly, Plaintiff respectfully prays that the Court enter a Protective Order in a form as attached as Exhibit 1.

Respectfully submitted,

GREAT LAKES EXPLORATION GROUP LLC

By: //s// Richard T. Robol
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2005, a copy of the foregoing was served by the Court's ECF service upon all counsel of record.

//s// Richard T. Robol